

Comments on the 2008 Regional Transportation Plan

The Southern California Association of Governments (SCAG) reviews and considers all public comments submitted on the RTP. SCAG records, tracks, and maintains a log of all comments and SCAG's responses. The formal comment period on the 2008 RTP lasted over 10 weeks, from December 6, 2007, through February 19, 2008. During this period, SCAG received letters and public testimony from over 150 entities commenting on a wide range of topics in the RTP, most notably its growth forecast, which ultimately resulted in the replacement of the higher density Policy Forecast with the locally-preferred Baseline Growth Forecast as the RTP's adopted growth forecast.

SCAG's Transportation and Communications Committee (TCC) reviewed comments received at their March 2008 meeting. The comments have been evaluated throughout the planning process and assessments have been made whether, and to what extent, modifications needs to be made to the Plan as a result of comments received.



Southern California Association of Governments
May 5, 2008

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-001	2/19/08	Seely, Melinda	AirFair	Web form	I believe we need to facilitate a maglev system and additional ground transportation solutions to the airport problems in the region. rail/maglev for short-haul trips (OC-Las Vegas, OC-San Fran, OC-San Diego, OC-Arizona) makes much more sense than adding further flights to our already overburdened OC Airport (JWA).	Comment noted.
08-002	2/19/08	Ayala, Luis	Alhambra, City of	Letter	The City of Alhambra encourages SCAG to continue to support the completion of the 710 freeway as soon as possible. A significant amount of relief is provided as far away as the San Fernando Valley, and with in the 5 freeway corridor. The completion of the GAP on the 710 route between the 10 and the 210 will complete the freeway network planned and begun in the 60s.	Comment noted.
08-003	2/19/08	Garcia, Eugenia	Aliso Viejo, City of	Letter	1 of 3 We are in agreement with OCTA that the Orangeline Maglev Project should not be included in the RTP Constrained Plan but should be in the RTP Strategic Plan. 2 of 3 The Riverside to Orange County "tunnel" should also not be included in the RTP Constrained Plan but should be in the RTP Strategic Plan. 3 of 3 SCAG should use the local Baseline Projections (from the OC Projections produced by Cal-State Fullerton's Center for Demographic Research) instead of SCAG's Policy Forecast model. SCAG is proposing that within current financial constraints, the goals and benefits beyond year 2015 can be increased by incorporating land use strategies that are more efficient by a redistribution of growth at the county, city and TAZ levels from the baseline. As has been pointed out by several Orange County cities, in several workshops Orange County cities need assurances that General Plans are considered and upheld in the RTP growth forecasts, including all OCTA transportation projects, and Measure M-funded projects without jeopardizing funding.	1 of 3 Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008 2 of 3 Comment noted. 3 of 3 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies and strategies. The Baseline Growth Forecast for the City of Aliso Viejo is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.
08-004	2/15/08	Smith, Scott C.	Aliso Viejo, City of (via Best Best and Krieger)	Letter	1 of 2 The City invites SCAG's attention to an ill-conceived distribution facility being proposed by the United States Postal Service that appears to be inconsistent with the policies and goals expressed in the Draft RTP. The proposed high-truck traffic postal facility would be built in the middle of the City's existing low and high-density residential neighborhoods, exacerbating land use and goods movement conflicts. 2 of 2 The City suggests that the RTP include a policy that directs goods movement and logistics industries that rely on large truck traffic to areas that are within close proximity to regional serving transportation corridors. The City also suggests that proposed dedicated truck lanes be expanded to serve areas beyond the San Pedro Bay Ports to include all regional transportation corridors and be available to all truck traffic. The Draft RTP's proposal for dedicated lanes for clean technology trucks should be expanded to include all truck traffic, and not just clean technology trucks. A proposed siting of a United	1 of 2 Comment received and noted. 2 of 2 SCAG's Comprehensive Regional Goods Movement Plan and Implementation Strategy will investigate the relationship between land use (especially intermodal facility and warehousing) and freight transportation network and develop improved strategies, including dedicated truck lane strategies.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					States Postal Facility in the City illustrates why such additional policy direction is needed to minimize the adverse impacts of goods movement on the community.	
08-005	1/23/08	Baird, Nathan	Amigos de los Rios	Public hearing	I represent the Amigos de los Rios in El Monte. Our hope is that transportation projects will be viewed as multi-benefit projects in the future. Those working towards ensuring open space in our communities feel money is so tight just as it is in every field. We have to see opportunities to provide environmental goods, but we also have to meet multiple needs, and I think the transportation field for a long time has just been trying to meet the transportation needs to the exclusivity of other needs, and it's been really great to see we've had so much growth in the field, all these mitigations that are required now, that I would hope that transportation projects in the future will go beyond just mitigation, to also try to clean up even more. We have so much money to do infrastructure. Anytime we can do new infrastructure, we should be thinking about the best practices to improve the environment and to meet multiple needs.	Comment noted. The 2008 RTP PEIR includes mitigation measures to address the impacts of the transportation plan and future growth. Project implementing agencies have the authority to require further mitigation measures on subsequent projects in order to substantially lessen or avoid significant effects on the environment.
08-006	2/15/08	Vander Dussen, AICP, Sherri	Anaheim, City of, Planning Dept.	Letter	<p>1 of 6: Upon review of the Policy and Envision Growth Forecasts, staff has identified significant inconsistencies between these projections and the local input that the City of Anaheim ("City") has previously provided to SCAG. This local input is accurately reflected in the OCP-2006 and incorporated into the Baseline Growth Forecast. As described in detail in Attachment 1, the land uses and distribution of growth for the City that are reflected in the Policy and Envision Growth Forecasts vary greatly from the OCP-2006 and are unlikely to occur. The OCP-2006 was developed through a "bottom-up" process that involved substantial input from all local governments in Orange County, including Anaheim. It represents the most likely growth projection for the County and accurately reflects growth opportunity areas and growth influencing factors such as sensitive habitat areas, flight path-restricted development zones, and approved development agreements. Staff believes that the OCP-2006 also represents a growth forecast consistent with the growth principles outlined in the RTP. Generally, the inconsistencies between the OCP-2006 and the Policy Growth Forecast are as follows:</p> <p>1. The Policy and Envision Growth Forecasts significantly differ from local input and the City's General Plan. Most notably, these forecasts are inconsistent with the growth anticipated for the City's Downtown, Platinum Triangle, and Anaheim Resort areas. 2. The Policy and Envision Growth Forecasts were developed following minimal consultation with local jurisdictions. The projected land uses and development intensities were finalized prior to review by local governments, resulting in land use assumptions that are in direct conflict with the growth distribution planned by the City. 3. The benefits of the Policy Growth Forecast, as identified in the RTP and the PEIR, are minimal with respect to Orange County while the impacts to the County's arterial highway speeds, which are reduced by this forecast, may be substantial. Given that the Regional Transportation Plan establishes numerous regional policies that local agencies must address in their project</p>	<p>1 , 2, 3 of 6 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Anaheim is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document. Further, the phrases "business as usual" and "urban sprawl" in the characterization of the Baseline Growth Forecast have been removed.</p> <p>4 of 6 This project has been added to the 2008 RTP's Strategic Plan.</p> <p>5 of 6 Comment noted. ARTIC is an RTIP project and appears in the list of RTIP projects in this RTP's Project List. It does not appear in Table 3.5 since this table reflects a list of major projects in the RTP that are not in the RTIP.</p> <p>6 of 6 See the Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter number 38.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>and environmental reviews, staff cannot support or accept the distribution of growth included in the Policy and Envision Growth Forecasts. We, therefore, request that SCAG use the 2006 Orange County Projection (OCP-2006) as the growth forecast in adopted in the RTP for the Orange County sub-region and as the basis for all associated environmental and air quality determinations. Please consider these comments applicable to both the RTP and the PEIR.</p> <p>2 of 6:</p> <p>Pages 47 through 62 of the RTP offer an extensive description of the future growth anticipated in the region based on the Policy Growth Forecast. The interrelationship between growth (population, housing, and employment) and the transportation system is fully recognized; however, the forecast used in the RTP must acknowledge the realities of land use planning and take into consideration various constraints on growth and intensification of uses based on infrastructure capacities and environmental concerns. As discussed in the previous section, upon review of the Policy Growth Forecast, staff has identified numerous significant inconsistencies between the forecast and the City's adopted General Plan and other planning documents and programs. These inconsistencies render the Policy Growth Forecast unreasonable, unrealistic and inconsistent with planned local transportation infrastructure. This situation is in direct conflict with the wording contained on Page 86 of the document which states that the forecast adopted as part of the RTP must be reasonable, realistic and consistent with the planned transportation infrastructure. Because the data in the OCP-2006 represents the most likely future growth pattern in the City and Orange County, staff requests that the OCP-2006, developed cooperatively amongst all Orange County jurisdictions, represent the preferred growth projection used as the basis for the RTP.</p> <p>3 of 6:</p> <p>Page 62 refers to the growth identified in the Baseline Forecast, which incorporates the OCP-2006, as "supporting urban sprawl" and representing a growth scenario that is: "...very similar to the status quo, taking a somewhat "business as usual" approach that is not steered by regional policies. Thus, for example, fast-growing suburban cities would likely continue to grow primarily through auto-oriented single family housing with commercial activities focused toward the highway system. The baseline growth distributions would result in severe traffic congestion and vehicle emission. The baseline land use could be tempered, and in some cases bolstered, by policies and programs designed to improve future travel patterns and vehicle emissions." The statement does not recognize that significant land use changes have taken place in Anaheim and much of Orange County. It also does not recognize the fact that the majority of growth in Orange County and in the City will consist of higher density, infill development. For example, the City's 2004 General Plan update and subsequent Platinum Triangle Master Land Use Plan resulted in the redesignation of hundreds of acres of land for high density residential and mixed-use development while largely utilizing existing infrastructure and focusing on access to transit. As such, the above listed statements should be deleted from the document or changed to reflect that many regions and cities</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>have changed their local general plans and are practicing growth principles consistent with those identified in the RTP.</p> <p>4 of 6: The City of Anaheim has partnered with the Orange County Transportation Authority (OCTA) to study new transit connections between major employment and activity centers in the City and its two Metrolink station facilities as part of OCTA's Go Local Program. The City's initiative is consistent with OCTA's Project S (High Capacity Transit Extensions to Metrolink), which earmarked up to \$1 billion as part of Orange County's voter approved Renewed Measure M half-cent sales tax program. In December 2007, the Anaheim City Council adopted a Transit Master Plan which identified a number of new high-capacity transit systems in the City. Among those systems contemplated in the Plan is a proposed 3.4-mile elevated fixed-guideway system that would connect the Anaheim Regional Transportation Intermodal Center (ARTIC), The Platinum Triangle, and the Anaheim Resort. This system is anticipated to begin revenue operations by year 2015. The City anticipates conducting a federally defined Alternatives Analysis/Environmental Document/Preliminary Engineering as part of the next phase in Summer 2008. Therefore, the City requests that the proposed elevated fixed-guideway system be added to Table 3.5 Transit Corridor Projects on Page 108.</p> <p>5 of 6: The City also requests that the planned ARTIC facility be added to Table 3.5 Transit Corridor Projects on Page 108. Located adjacent to the Orange (SR-57) Freeway in the Platinum Triangle area, ARTIC will be a gateway station connecting Metrolink commuter rail service, Amtrak, BRT, fixed-route bus service, an elevated fixed-guideway system connecting with the Anaheim Resort. The City is partnering with OCTA to solicit a private partner to help build, finance and maintain ARTIC. The facility is planned to build upon OCTA's Metrolink Expansion and Bus Rapid Transit (BRT) programs and is envisioned to become the transportation hub of Orange County. ARTIC will offer direct baggage check-in and express service to local airports, and potentially high-speed train service connecting Orange County to other regions within California and beyond. Moreover, ARTIC is planned to be integrated into a mixed-use development in a manner consistent with SCAG's Compass Blueprint Implementation Strategy of focusing high density development and growth around major transportation corridors and centers. ARTIC is also consistent with OCTA's Project T (Convert Metrolink Station(s) to Regional Gateways that Connect Orange County with High Speed Rail Systems) and up to \$226.6 million has been allocated as part of the Renewed Measure M. The interim phase of ARTIC is expected to be build by 2015 with full build-out expected by 2030.</p> <p>6 of 6 Is a PEIR Comment to be addressed by PEIR Staff.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-007	1/10/08	Larsen, Scott A.	Bellflower, City of	Multiple Signers	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-008	1/12/08	Baty, Jonathan	Bicycle Commuter Coalition of the Inland Empire	email	I think the maps and "facilities" are nice but the report really needs to emphasize the following. Also, the class one bikeways that have no at grade crossings like the SART and the other river trails should be emphasized as Bike Freeways and patrolled by CHP bike patrols. The River trails are great North South corridors, but we really need to iron out some good East West bike freeway connectors to them. The American Association of State Highway and Transportation Officials (AASHTO) Guide for the Development of Bicycle Facilities has a very powerful statement: "All highways, except those where cyclists are legally prohibited, should be designed and constructed under the assumption that they will be used by cyclists. Therefore, bicycles should be considered in all phases of transportation planning, new roadway design, roadway reconstruction, and capacity improvement and transit projects." (AASHTO, Washington DC, 1999)I think if the AASHTO statement which matches Caltrans Deputy Directive attached could be a planning principle that SCAG champions to all of the regional planning agencies, we would see striped shoulders on state highways, wide outside lanes or bike lanes on all arterials, and low speed limits on feeders. Another great thing SCAG should add to the designers portfolio are the blue bike boxes Portland is putting at intersections for cyclists to be given front row position at intersection away from all the idling fumes. http://www.autobloggreen.com/2008/01/07/portlands-bike-boxes-make-the-city-even-more-bike-friendly/ Doing things like this can really make cycling a first priority rather than an afterthought. It also supposedly minimizes right hooks by motorists at intersections. I will give this whole thing a read, but these are some of my first impression comments. Also, I would really like to see all those "Class 1" Facilities in Western Riverside County in a detailed map, because a lot of it does not ring a bell with me as existing? I like the goals of increasing percentages for walking and biking, but I think since biking is currently only one percent and Davis is at like 20 percent of all trips a bicycle tripshare increase of 300-500 percent would not be overstating the possibilities. Banning on street parking on all arterials and requiring at least 16' wide outside lanes with no on street parking would be an amazing improvement for cyclists. A cyclist has to give a parked car at least 3-4 feet of clearance just to stay out of the deadly door zone so a parked car consumes 12' of lane!	Comment noted. SCAG uses the standard terminology for bicycle facilities, Class 1, Class 2 and Class 3. SCAG is examining ways to increase the usage of bicycle facilities, and connections to regional significant Class 1 facilities. SCAG is also working to increase accommodation and planning (complete streets concept) for all modes thereby making bicycling and walking a feasible travel choice on multiple roads. The 2008 RTP Non-Motorized Supplemental Report includes a Caltrans policy based on the AASHTO statement. "In 2002, Deputy Directive 64 (DD-64) created a policy which directed Caltrans to 'fully consider the needs of non-motorized travelers (including pedestrian bicyclists and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.'" In Chapter 3 of the 2008 RTP and in the RTP Non-Motorized Supplemental Report, SCAG recommends increase planning, funding and priority for the needs of bicyclists and pedestrians. SCAG will continue to look at how to improve planning for bicyclists in conjunction with other transportation agencies. It should be noted that engineering for state highways is done by Caltrans. Arterials are engineered by the cities and counties. The maps for Western Riverside County were developed for the Western Riverside Council of Governments (WRCOG), who provided the information to SCAG. If you are interested in viewing a County map at a smaller level, please contact WRCOG.
08-009	2/15/08	Stehly, Mark	BNSF Railway Company	Letter	1 of 2 PEIR Comment 2 of 2: BNSF respectfully requests that SCAG confirm that the SCIG project will be included in the Final RTP as indicated by the sections of the Draft RTP discussed herein. BNSF also requests that the Final RTP provide that SCIG is privately funded. This information is important to ensure that the record is	1 of 2 See the Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter number 42. 2 of 2 Comment noted. SCAG will add appropriate language to the 2008 RTP noting that if the SCIG/intermodal facility is approved, it will be

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>clear that BNSF is not seeking, and that SCIG will not require, any public funding. The Draft RTP: Forecasts regarding goods movement growth and the Port's projected inability to handle increased cargo beginning in 2010. BNSF understands that SCAG has included the privately-funded SCIG project in the Draft RTP because its inclusion is consistent with the long-range planning goals described in the PEIR. For example, the Draft RTP states that in developing baseline regional transportation forecasts, SCAG included: demand forecasts for cargo and passengers and the regional ports and airports. The port and airport demand forecasts include projects that improve operations and increase capacity. Intermodal expansion was assumed in terms of additional capacity at the ports for goods movement growth, and the trips associated therewith were assumed located in the Inland Empire. The VMT [vehicle miles traveled] and related emissions regarding such trips are incorporated into the modeling analysis. Draft RTP at p. 52. If SCIG is approved, it will reduce truck trips to the Inland Empire, and thus reduce the VMT associated with SCAG's current assumptions. The Goods Movement Report recognizes the fact that SCIG will reduce truck-related VMT: RTP Goods Movement Report at p. 15. SCAG also observes that: "The BNSF has also proposed developing a near-dock facility called SCIG, which is projected to accommodate increasing trade volumes while also reducing truck traffic on the I-710." RTP Goods Movement Report at p. 33. Also, Table 4 at page 9 of the RTP Goods Movement Report highlights planned on-dock and near dock facilities in the San Pedro Bay Ports area, and lists what appears to be SCIG in the Phase II near-term category (by end of 2010). It is referred to as "New Near-Dock - South of Sepulveda (potential)." POLA is listed as the sponsor and the development cost is listed as n/a. SCAG also has identified "Intermodal Facilities (Location TBD)" in the Regional RTP section of the Project Listing Report, which is another report included in the Draft RTP. None of the references to SCIG in the Draft RTP or the RTP Goods Movement Report, however, indicate that SCIG will be privately funded. This is an important distinction that will make the Final RTP more precise by ensuring that other government agencies and the public are aware that BNSF is not seeking any public funds for the SCIG project. In addition, the 2008 Final RTP will be the first RTP that SCAG will issue after the passage of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users ("SAFETEA-LU"), Public Law 109-59, August 10, 2005. Under this recent law, the RTP must contain a financial plan that "demonstrates how the adopted transportation plan can be implemented, [and] indicates resources from public and private sources that are reasonably expected to be made available to carryout the plan...SAFETEA-LU Section 134(i)(2)(C). In view of the fact that SCIG will increase intermodal capacity at the Ports and will reduce truck-related VMT for at least a portion of the planning horizon addressed in the Draft RTP, it is prudent to note in the Final RTP that SCIG is privately funded.</p>	privately funded.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-010	1/30/08	Priest, Todd	Building Industry Association of S.C.	Public hearing	I represent the Building Industry Association of Southern California which operates in the same jurisdiction as the counties of SCAG. We just wanted to comment this morning. We will provide formal comments that our concern is similar to what was provided by the previous speaker is that the growth policy forecast numbers tend not to match up very well with all the hard work that's been done by cities, counties, and COGS. As we try to manipulate where growth should occur, we're discounting the work that's been done and the financial investments that have been made by our cities. While we support the region looking at a way to incentivize the development of certain patterns, we need to not discount the work that's gone in to the original baseline numbers and make sure that that is depicted as the responsible alternative in the RTP. So I'll provide further comments in the future.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the region is consistent with the input from local jurisdictions, as documented in the 2008 RTP Supplemental Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-011	2/20/08	Priest, Todd	Building Industry Association of S.C.	Letter	Throughout the RTP, the use of Baseline Forecast has been characterized as "Business as Usual." This term implies that communities are not embracing mixed-used development and increased densities. This claim is unsubstantiated. One does not need to look very hard to see that these types of projects are being developed throughout Southern California. These projects are possible because of evolving consumer choice and economics. Just as many Southern California families desire to live in a single family detached neighborhood, others prefer a more compact and walkable environment. As stated earlier, our communities vary and so does their willingness and desire for change. Cities that have begun to permit a variety of development choices in their communities should be encouraged. The Draft RTP also includes language regarding the usage of the term "sprawl." We also believe this to be potentially misleading. For example, when describing the projected growth of the region through the year 2035, the draft RTP includes statements such as, "The baseline forecast supports the current urban sprawl from Los Angeles and Orange Counties to Riverside and San Bernardino Counties. It would yield a growth scenario very similar to the status quo, taking a somewhat 'business as usual' approach that is not steered by regional policies" (pg. 62). We feel that this statement should be eliminated. Take Orange County, for example. Orange County is the fifth most populous county in the country. While Los Angeles County is the largest county in the country, Orange County is far more dense when you contrast land mass with population. Regarding "regional policies," therefore, it is important to be mindful that land-use decisions are made locally, and that regional policies are advisory. Accordingly, the RTP should not rely upon such broad-brush, uncritical statements as the basis for seeking federal approval of the RTP. We applaud the inclusion of such critical transportation links as the High Desert Corridor in the RTP. These linkages will provide increased mobility throughout our growing region. With an expected population increase by 2035 of 6 million, or roughly the population of an additional 20 cities the size of Riverside, we must begin making those vital links within our region. Our region faces many transportation challenges. While we look for the most effective way to increase mobility throughout our region, we encourage SCAG to create stronger partnerships with our cities and transportation agencies. It will be through these relationships that the best	The phrases "business as usual" and "urban sprawl" in the characterization of the Baseline Growth Forecast have been removed from the 2008 RTP.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					planning will take place at the local level, thereby improving mobility at the regional level.	
08-012	2/19/08	Kriske, David	Burbank, City of	Letter	<p>1 of 4</p> <p>The Draft RTP Highways and Arterials Report shows unexpected trends in average speeds on many freeway segments in Los Angeles County. In particular, Exhibits 12 and 13 show speed increases during the AM and PM peak hour between 2003 Existing and 2035 Base, including portions of Interstate 5, Interstate 10, State Route 60, Interstate 210, Interstate 710, and US 101. While some capacity improvements under the base year are included, certain freeway segments have no capacity improvements, and limited transit improvements are planned under the Base scenario. Also, these speed increases are in spite of two-fold increases in truck traffic on many of these freeways (RTP Table 2.6). Is SCAG projecting decreases in automobile and truck traffic on Los Angeles County freeways under the 2035 Base Year? If so, the City feels that these traffic projections downplay the severe accessibility and congestion degradation that will occur in the urbanized areas of Los Angeles County, and will ultimately misallocate transportation resources from the urbanized core to the outer periphery. Under the 2035 Scenario, it appears that SCAG is projecting greater rates of traffic growth (VMT) on arterial streets (45% ADT growth) than on freeways (32% ADT growth). This is in contrast to the Plan Scenario, where traffic increases are more equally distributed between freeway and arterial facilities. What land use or transportation strategies under the Plan Scenario cause traffic to be more equally distributed between freeways and arterials?</p> <p>2 of 4</p> <p>While the City is pleased that SCAG has modified their original Compass Growth Forecast as a result of community input, we still have reservations that some of the commercial and residential densities projected in the City of Burbank conflict with the densities outlined in the City's planned Land Use Element Update. The City feels that, while SCAG's approach to concentrating new development near transit nodes and corridors is an effective way to manage future congestion, care should be taken to ensure that projected growth forecasts are in line with local agency's adopted land use plans.</p> <p>3 of 4</p> <p>The City of Burbank continues to disagree with SCAG's forecasted growth projections for the Bob Hope Airport. The City does not believe that the airport's ground access and circulation systems can support 9.4 million annual passengers (MAP) without major increases in ground access capacity improvements. Required improvements are not politically feasible, and construction of required improvements would be detrimental to existing neighborhoods in the City of Burbank. While the City is in support of new transit connections to the airport, we do not believe that these improvements will provide the necessary ground-access to support the MAP level identified by SCAG. The City currently projects a MAP of 7.2 at the Bob Hope Airport as</p>	<p>1 of 4</p> <p>Exhibits 12 and 13 depict speed degradations between 2035 Baseline and 2003 Base Year, not speed improvements. In the Final 2008 RTP, the legends will be revised to clarify the speed changes shown on the referenced map. Speed improvements can be expected in certain areas, though, because the 2035 Baseline scenario does include almost \$14 billion in highway improvements over 2003 Base Year.</p> <p>On March 6, 2008, SCAG's Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The revised modeling analysis shows that under the 2035 Plan Scenario, freeway VMT is expected to increase by 36% over 2003 Base Year while arterial VMT is expected to increase by 42%. In contrast, the 2035 Baseline Scenario suggests freeway VMT is expected to increase by 31% over 2003 Base Year while arterial VMT is still expected to increase by 42%. Plan improvements to the freeway network, by relieving congestion, explain the difference in freeway VMT growth between Baseline and Plan</p> <p>2 of 4</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Burbank is consistent with the local input, as documented in the 2008 RTP Growth Forecast Report, provided by subregions and cities within Los Angeles County. Additionally, the "Local Survey" section in the Growth Forecast Report of the Final 2008 RTP indicates that in April 2005, SCAG solicited updated land use and development information for the development of the 2008 RTP, and that "SCAG made adjustments to the existing small area estimates and forecast, as the updated information [from the general plans] was submitted by local jurisdictions." Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>3 of 4</p> <p>In forecasting air passenger and cargo demand for constrained air carrier airports in the Regional Transportation Plan, constraints must be objectively determined. They must be based on either legally-enforceable policy constraints (such as at Long Beach or John Wayne airports) or physical capacity constraints at airport facilities. This forecasting procedure has been approved by SCAG's Aviation Technical Advisory Committee (ATAC) and Aviation Task Force (ATF). For Bob Hope Airport, physical capacity constraints relate to the</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>part of its long-range forecasts.</p> <p>4 of 4</p> <p>The Draft RTP identifies dedicated truck lanes on many freeways as part of the Comprehensive and Strategic Plans. While truck traffic increases are a significant issue, proposals for extensive, double-deck truck lanes throughout the region should not be considered before a serious effort is made to implement pricing mechanisms to control and mitigate existing truck traffic in the region. While the Draft RTP mentions the desire to study truck congestion pricing and user fees as part of the Strategic Plan, work in this effort should be a top priority for the region, before consideration of expensive and potentially environmentally harmful truck-only facilities. In particular, investigation into how pricing could divert goods movement to rail facilities, and a study of how pricing would affect truck VMT in the region should be considered ahead of any major new facility investments. SCAG should use the 2008 RTP as a policy platform to further a regional discussion of how pricing mechanisms can influence travel behavior, improve air quality, limit sprawl, and provide revenue for needed capital infrastructure.</p>	<p>airport's 14 terminal gates/aircraft parking positions. At the request of the Burbank-Glendale-Pasadena Airport Authority and Bob Hope Airport staff, the assumption in the 2004 RTP that the airport could accommodate an additional three remote aircraft parking positions has been deleted from the 2008 RTP aviation demand forecast. This lowered the forecast/physical capacity constraint for Bob Hope Airport from 10.8 million air passengers (MAP) by 2030 in the 2004 RTP to 9.4 MAP by 2035 in the 2008 RTP. The new 9.4 MAP forecast/physical capacity constraint for the airport in 2035 has been reviewed by Bob Hope Airport staff.</p> <p>4 of 4</p> <p>SCAG will embark upon a three year Congestion Pricing Study- to evaluate pricing strategies and their feasibility within the region. A key component of this study will be to evaluate the feasibility of Truck Only Toll lanes in addition to GPS based pricing for commercial vehicles</p>
08-013	2/19/08	Marckwald, Kirk	CA Railroad Industry	Letter	<p>1 of 5</p> <p>Rail Expansion Strategies -The Draft RTP proposes approximately \$3.0 billion in rail expansion projects to be funded with approximately: \$1.5 billion in Rail Container Fee Revenue Bonds, \$1.0 billion in Metrolink Revenue Bonds, and \$0.5 billion from State 1B grants. The Railroads recognize that investment in rail expansion and rail efficiency is necessary to accommodate projected freight levels. However, the RTP is flawed inasmuch as it interposes a governmental planning organization with little or no expertise in national freight rail operations, such as SCAG, as the strategic planning entity determining when and how private rail lines should be expanded and then requires the private railroads to pay fees to a public entity to pay for those investments. Network development and design is extremely complicated and involves analysis of more than just mainline expansion in a single region. Decisions concerning investment in terminals, rail yards, locomotives, freight cars and siding capacity must be considered in light of trends across the spectrum of national freight demands, along with other investments in other areas outside of the SCAG region to prevent bottlenecks. While international intermodal freight is an important component of rail business, the Railroads have critical network needs (and capital demands) for a host of other customers around the country: wheat, corn and other agricultural products from the Midwest; coal and other minerals from mining operations around the country; industrial products; and automobiles. When and where rail capacity investment on individual rail systems is needed is Freight Railroad Comments on 2008 a question which requires constant review and revision, is affected by changes in market demands and business cycles, and does not lend itself to the sort of long-term planning which may be more appropriate for a regional government agency planning</p>	<p>1 of 5</p> <p>SCAG concurs that an enhanced rail system requires close collaboration between the public and private sectors. Accordingly, SCAG will continuously seek input from the rail industry and other stakeholders in terms of developing a comprehensive regional rail system plan and investment strategy. The proposal in the 2008 RTP serves as a framework for further discussion with the appropriate parties in addressing the region's goods movement and passenger facility needs.</p> <p>2 of 5</p> <p>Comment noted.</p> <p>3 of 5</p> <p>SCAG's proposed rail investment package assumes the accelerated implementation of Tier 4 engines. This will be further clarified in the Final 2008 RTP. We appreciate your comments. Again, the rail proposal identified in the 2008 RTP serves as a framework for further discussion amongst appropriate parties to address the region's freight rail needs and associated air quality challenges.</p> <p>4 of 5</p> <p>Comments noted. SCAG will coordinate with the railroad industry, stakeholders, and other interested parties in HSRT planning activities described in the 2008 RTP.</p> <p>5 of 5</p> <p>Comments noted. SCAG will continue to examine the technological requirements of freight rail line electrifications in the future. Electrification is not included in the constrained plan currently.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>improvements to an existing highway system. It is imperative Railroads retain authority, and the flexibility that comes with that authority, to make changes to capital investment plans as warranted by changing circumstances over time. Accordingly, the Railroads question the efficacy and appropriateness for SCAG to propose mainline modifications and then essentially tax the industry to pay for these investments. There are many freight projects that entail extensive public benefits—such as environmental enhancements and improved freight efficiency— a private railroad would not otherwise fund, due to the constraints of capital budgets or the lack of a sufficient return on investment. Public funding in these instances is appropriate and does not represent a public subsidy of private beneficiaries, since a rail carrier will contribute financially commensurate with its benefit, if any. Finally, the draft RTP proposes a significant increase in the number of Metrolink trains that are proposed to operate on private rail lines. Although the draft RTP does provide for a funding mechanism to generate revenue to assist in the funding of such service, the assumption that such service level is achievable is premature. Any Metrolink expansion, if even possible on freight corridors, will have to be negotiated in the future by the interested parties.</p> <p>2 of 5</p> <p>Grade Separation Strategies: The Draft RTP proposes \$6.0 billion in new grade separation projects (projects which separate rail and road intersections) to be funded with \$3.97 billion in Port Container Fee Revenue Bonds, \$0.43 billion in Rail Container Fee Revenue Bonds, approximately \$0.97 billion in State 1B grants, and \$0.88 billion from county contributions. Standard grade separation projects do not enhance velocity, throughput or capacity for railroad operations. Instead, such projects provide a distinctly public benefit by moving vehicles resulting from nearby development over or under rail lines. Investments should be funded by a variety of public funding sources, including the National Highway Trust Fund, other federal sources, and contributions by the state and local sector.</p> <p>3 of 5</p> <p>Locomotive Engine Upgrades: The Draft RTP proposes \$3.8 billion be spent to accelerate introduction of Tier 3 and Tier 4 locomotives in the SCAG region, to be funded with \$1.88 billion in Rail Container Fee Revenue Bonds, and \$1.88 billion from U.S. EPA grants. The Draft RTP incorrectly indicates that Tier 3 locomotives will be available in 2009; the U.S. EPA NPRM indicates that Tier 3 locomotives will not be available until 2012. SCAG should clarify whether its locomotive engine upgrade strategy will apply to Tier 3 locomotives, or if the strategy only applies to Tier 4. SCAG assumes that half of the funding for the locomotive engine upgrade strategy will be provided by grants from U.S. EPA. However, SCAG has not documented any evidence that U.S. EPA has committed to this funding, and without such evidence that the</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>grants are "committed, available, or reasonably available revenue sources," SCAG should not include this strategy in the financially constrained RTP. Early investment in Tier 4 locomotives will provide a predominantly public benefit. SCAG's proposal that the Railroads pay for 50% of the cost of the expedited purchases imposes an obligation on the private sector to fund public benefits in a manner that violates the carefully developed regulatory framework contemplated by the recently completed federal rules. The Railroads understand that while Tier 4 locomotives will have lower air emissions, it is expected that there will be a decrease in fuel economy, a loss of range, increased capital costs, increased operating costs, increased maintenance costs, and require substantial investment in new infrastructure to support the operation of the new locomotives. The Railroads do not and cannot agree with SCAG's proposal that the Railroads pay 50% of the cost of the expedited new locomotives.</p> <p>4 of 5</p> <p>High Speed Regional Transportation: The Draft RTP proposes to construct a maglev system to move freight containers from an undetermined port location to another undetermined freight terminal along the I-710 corridor. The maglev infrastructure will be privately financed by American Maglev over existing public right of ways. Unfortunately the Draft RTP lacks detail on several important elements of the project. The Railroads submitted comments to SCAG on the feasibility of an HSRT freight system in June and October 2007. The following points summarize Railroad concerns: 1. Detailed SCAG contractor spreadsheets showing how all aspects of the project are analyzed (revenues, costs, or emission reductions) are necessary in order to develop substantive comments. 2. SCAG should clearly define the project by providing all of the necessary details, including the current assumptions regarding the number of containers moved, the number of cars, the speed of the moves (transit time), the number of tracks required at the ports and the inland facility, and the revised maps showing the chosen routes. 3. The lack of data regarding the undefined Port Facility or an inland empire facility makes it almost impossible to assess the feasibility of the project. The project cannot be assessed or the RTP without this information. 4. A high speed rail project which terminates in or around the inland empire will not reduce truck travel (VMT); it will merely relocate the VMT. The VMT associated with the millions of containers currently moved near the ports will simply shift to a concentrated location in the inland area. 5. SCAG should address the issue of redundancy with the current system. 6. Developing a high speed system for freight alone will be very complicated. Integrating the freight system with the passenger system seems significantly more difficult. No information about this integration has been presented. 7. Funding, interagency coordination, and construction issues also need to be addressed. The Draft RTP indicates that a fee will be charged to help</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>pay the cost of the freight maglev system. However, it does indicate the amount of the fee and who would be responsible for paying the fee.</p> <p>5 of 5</p> <p>Electrification for Freight Rail Lines: The most recent SCAG proposals, and all previous studies of electrification in southern California, raise insurmountable operational and cost-effectiveness issues that must be thoroughly considered in any public policy discussion. While the concepts may seem simple at first, the unique complexity of railroad operations in southern California and the large distances considered for electrification make the analysis of electrification far more complex than one might expect. There is a special conundrum presented by electrification of a linear system; to get maximum benefits and avoid doubling-up on different kinds of locomotive investments, the electrified system has to be so massive that the costs to achieve relatively few tons of emissions reductions become astronomical. Simply put, electrification of the Southern California freight and passenger lines will lead to increased inefficiencies (fewer containers could be moved on the system), tremendous costs (potentially \$10 billion-\$50 billion), few emission reductions, increased visual impacts from new substations and power lines, and decreased system reliability.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-014	1/25/08	Van Haagen, Antonius	Caltrans	Email	<p>1 of 3 is a PEIR Comment</p> <p>2 of 3: In the document CONFORMITY.PDF on page 7 there also is a reference to the SCAG 2003 Model Validation Report of May 2007. SCAG notes on that page that at the Modeling Task Force meetings regionally significant modeling issues are being discussed. It should be noted that no definitive information has been provided yet on the details of the future year forecasts. This is in fact hard to do as the TransCAD software has been shown to give different answers for model runs with exactly the same input. This problem was discovered in September 2007. Hopefully the new TransCAD 5.0 version will resolve the software issues. Caltrans has not received this version yet from Caliper corporation. Once these problems have been resolved Caltrans and other agencies should be given the opportunity to run some of the future year scenarios. Only then do we know precisely how the model runs were performed. The more experts look at the model the more likely it is that problems will be avoided in the future.</p> <p>3 of 3: The section on Growth in GROWTH.PDF gives a detailed description of the 4Ds Land Use/ Transportation Model analysis. In Table C5 on page 74 the Model Plan VMT for the region is 493,304,163. This number differs greatly from the 2035 Plan VMT for the region in Table 3.14-11 which is 551.6 million. How are we to explain this difference? It is possible that the HDV VMT is excluded. The L&MD VMT for the 2035 Plan is given as 499,897,665 on page 22 of CONFORMITY.PDF which still differs but not that much. The total Plan VMT in this document is 548,232,112. On page 72 of GROWTH.PDF there are two tables C3. The second one is presumably table C4. On page 73 second column to the phrase ' , shown in column four' the phrase 'of Table C3' should be added. The tables do not have a reference to a particular year. Is it the 2035 Plan scenario? The total base year 2003 VMT is 408,641,005, the plan 2008 Plan total is 422,776,953 on page 21 of the Transportation Conformity Report. The 2008 Base Year(?) VMT is given as 429.2 million in Table 3.14-11. What do these year 2008 numbers really refer to? On page 171 of the Draft_2008RTP.pdf it says that the 4Ds strategies have not been incorporated into the 2008 RTP performance results. So I assume that the above VMT totals have not been obtained by 4D post processing. Obviously the various parts of the draft RTP have different authors. Hence we get different numbers for the same totals. In the final RTP these differences should not appear and a consistent terminology should be used to refer to them.</p>	<p>1 of 3 See the Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter number 5.</p> <p>2 of 3 1) On the question of SCAG Regional Travel Demand Model development, SCAG presented at Modeling Task Force (MTF) meetings on various model components and the Draft 2003 Model Validation Report and Summary. 2) On the question of TransCAD model run results consistency, SCAG and Caliper Corporation (the developer of TransCAD software) has conducted in-depth analysis of the issue and concluded that model results instability is caused by TransCAD multithreading application option. For 2008 RTP final model runs, this option is turned off. Thus, all model runs are consistent and duplicable. 3) On the question of future year model results, SCAG presented at MTF meetings various RTP assumptions for future year scenarios. Model runs for these scenarios were documented in current RTP Modeling List Supreport but were not available at the time of regular MTF meetings. 4) On the question of distribution of RTP models, SCAG will make available RTP model runs upon request. 5) On the question of modeling peer reviews, SCAG has conducted several formal peer reviews of the Regional Model. Peer panel members consisted of national experts from Federal, State, local agencies, universities, and consulting firms.</p> <p>3 of 3 Consistent with the March 6 Regional Council decision to adopt the Baseline Growth Forecast, the referenced "Appendix C- 4Ds Land Use/Transportation Model Analysis," (pp. 63-76) of the Draft 2008 RTP, Integrated Growth Forecast and Regional Land Use Report, has been removed from the 2008 RTP.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-015	2/5/08	Orso, Mario	Caltrans	Email	On page 2 of the project listing project 8020 on Route 98, we have change the description of the project we did sent comments for the RTP on this matter. The new description should read as follows: "IN CALEXICO FROM 0.5 KM WEST OF DOGWOOD RD. TO 0.3 KM EAST OF ROCKWOOD AVE., WIDEN HWY FROM 1 TO 2 LANES IN EACH DIRECTION WITH RUN POCKETS AT MAJOR INTERSECTIONS". Also on this project we should state that we are planning to construct this project in two stages. Another comments is also from page 2 of the project listing, RTP ID IMP0021 on Route 78 the description should read as follows : "BRAWLEY BYPASS CORRIDOR-IN AND NEAR BRAWLEY FROM 0.5 MILES SOUTH OF BAUGHTMAN ROAD TO MEAD ROAD - 4LANE EXPRESSWAY ON SR 86 TO 0.3 MILES NORTH OF MEAD RD. ON SR 111". The only thing missing is the "NORTH".	Requested changes will be incorporated into the RTP Project List.
08-016	2/19/08	Nguyen, Lam	Caltrans (HQs, Districts 7, 8, 11 & 12)	Letter	<p>1 of 12 RTP does not address the proposed Desert Xpress between Victorville and Las Vegas.</p> <p>2 of 12 A) Remove references to SCRAA B) Under the heading "Constrained Scenario", first paragraph, and second sentence is not clear when I states, "the airlines in investing adding flights...." C) Under the heading "Preferred Scenario", "(PMD)' in the second bullet should be moved to the first bullet. D) Replace "America West" with US Airways</p> <p>3 of 12 a. Table should clearly note which counties are included in SCAB, so you can look at the table and clearly see which counties are in non attainment for ozone, PM10, PM2.6, etc (p. 70). b. Imperial County portion of the Salton Sea Air Basin should be included in the list of areas that will be "bumping up" to worse ozone non-attainment designations (p. 70-71). c. Reference to South Coast Air Basin should include county identification (p. 172). d. It seems odd that the population and housing projections for Imperial County are both greater in the "Baseline Scenario" than in the "Plan Scenario." (Conformity Report, Tables 1, 2, 3, and 4</p> <p>4 of 12 a. Environmental Justice - "Overall the benefits of time savings will be the lower income groups who pay a smaller share of the taxes." This is an inconsistent statement. Time and taxes are two different things (p.28). b. Are benefits equally distributed? Are negatives equally distributed? Are negatives equally mitigated? For example, why are there many missing soundwalls in east L.A. and complete high soundwalls that have been re-constructed more than once in Brentwood, Rossmore, and other parts of Orange and L.A. Counties?</p> <p>5 of 12 Second column, bulleted list of open space mitigation measures: Should include a bullet that says, "Encourage land use mitigation to create a buffer between transportation facilities and sensitive receptors such as schools, hospitals, and residential uses."</p>	<p>1 of 12 RTP does not address the proposed Desert Xpress between Victorville and Las Vegas.</p> <p>2 of 12 1. References to SCRAA will be removed. 2. "Investing in adding flights" will be changed to "Investing in added flights." 3. (PMD) will be removed from the second bullet 4. "America West" will be replaced by "US Airways". These changes were made in the RTP and RTP Supplemental Report Aviation and Airport Ground Access.</p> <p>3 of 12 A) The referenced summary table identifies non-attainment areas which are made up of counties and parts of counties. The RTP Supplemental Transportation Conformity Report provides details to the complicated county-level description of the non-attainment areas. B) Comment noted. The requested change has been made on the pages referenced by commenter. C) The 2008 RTP includes summary discussions of the air quality and conformity analyses, which are also included in the RTP Supplemental Transportation Conformity Report. The Conformity Report includes detailed descriptions and figures depicting the air basins non-attainment areas in the SCAG region.</p> <p>4 of 12 a) SCAG appreciates the comments submitted by Caltrans. The Draft 2008 RTP stated that the "benefits of time savings will be enjoyed by lower income groups who pay a smaller share of the taxes" (page 28, Executive Summary and page 20 of the Draft 2008 RTP Environmental Justice Supplementary Report). The Final 2008 RTP will be changed to state the following: -Higher income groups (Quintile IV and V) will benefit the most from auto travel time savings. This is because they have higher access to personal</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>6 of 12 The map is unreadable. There should be a better map that shows the construction phases and timetable of the project. (Appendix A, p.13).</p> <p>7 of 12 We suggest a footnote or explanation clarifying why the additional potential warehouse sites (indicated by 3 pink circles) were selected.</p> <p>b. We suggest expanding the discussion concerning shared rights of way for good movement high speed rail transport and passenger service from the Ports of LA/LB.</p> <p>c. Discussion on Virtual Container Yards was confusion.</p> <p>d. Include San Ysidro in the discussion on cross-border trade activity</p> <p>e. SCAG's Goods Movement Strategy in the RTP is incomplete without in-depth consideration of the Imperial Land Ports of Entry (Report, p.5)</p> <p>f. more information about the Alameda Corridor is needed (Report, p. 11).</p> <p>g. Clarify "port truck access facilities (Report, p.14)</p> <p>h. Table 11 in Report should include the costs associated with these health effects</p> <p>i. Rail Grade Separations: SCAG's own study showed that freight/highway grade separations are the least cost effective method of reducing air emissions. (Report, p.26)</p> <p>j. Not just land availability but Land Use should be added as something that will have to be addressed if an inland port(s) are considered. (Report, p. 33)</p> <p>k. Need to acknowledge community's position on SCIG (Report, p. 33)</p> <p>l. Appendix C: Freight Rail Electrification: Where is freight electrification addressed in the RTP? Seems like it should be summarized in the RTP itself as one of the alternatives looked at.</p> <p>8 of 12 a. The Department accepts the "baseline forecast" as the foundation for the RTP 2008 modeling. b. Other alternatives proposed by SCAG with local input are variations of the base scenario (Baseline), with Socio-Economic data shifting within the region. Please keep in mind that the SED totals for the SCAG region remains virtually unchanged. c. The Department supports the SCAG Blueprint Planning activities outlined in the Draft RTP... d. Implementation Program section: First sentence states, "the 2008 RTP Policy Growth Alternative addresses the mandates of transportation planning law..." Should include a footnote to specify which transportation planning law is being referred to. (p.89)</p> <p>9 of 12 a. Lists centerline miles and miles of roadway and then says "most extensive HOV lanes in the country." Should also include # of HOV lane miles for consistency. (p.63) b. The RTP should more clearly identify and quantify regional needs expressed within both short and long-range planning horizons. Currently under the Transportation Strategy section (p.77), the Draft RTP identifies short-term planning horizons as 'projects in the pipeline' and long-range planning horizons in table-formats by transportation mode (i.e.. Table 3.2 Mixed Flow Highway Projects p. 101). c. Mobility Measures: Speed and</p>	<p>automobiles and will be using cars as their primary mode of travel. -Lower income groups (Quintile I and II) are more dependent on alternative forms of transportation (i.e. walking, biking, buses, etc.) . b) In addition to the 2008 RTP, SCAG has completed the Draft 2008 Regional Transportation Plan Program Environmental Impact Report (PEIR). The 2008 RTP PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing the projects, programs, and policies included in the 2008 RTP. The focus of the environmental analysis in the PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2008 RTP as a whole. It does not include site specific analysis of any project contained in the 2008 RTP. Individual projects and mitigation measures (e.g. constructing soundwalls in East Los Angeles) involve site-specific analysis to determine project level impacts.</p> <p>5 of 12 Under the Noise discussion in the RTP on page 137, last bullet, there is a summary of a measure which recommends a noise buffer between transportation facilities and sensitive receptors. The PEIR, Section 3.9 Noise mitigation measure MM-NO.15 further states, "Project implementation agencies shall employ, where their jurisdictional authority permits, land use planning measures, such as zoning, restrictions on development, site design, and use of buffers to ensure that future development is compatible with adjacent transportation facilities." A compatibility test includes comparing proposed transportation and land uses to existing sensitive receptors including schools, hospitals, and residential uses. As such, no changes are needed due to the similar protection between sensitive noise and air quality receptors. See also, response to Comment Letter No. 5, Final RTP PEIR 2008.</p> <p>6 of 12 Comment noted.</p> <p>7 of 12 The selection of potential warehouse sites is based on current and forecasted goods movement volumes, mode, Origin-Destination, transportation network connection, land availability etc. It will require further technical analyses to finalize. Cross-border goods movement issues were discussed in 2008 RTP Main Report (p. 9 and p. 117). "Port truck access facilities" are locations where port trucks originate or serve as destination points, such as intermodal and transloading facilities, warehousing, retailer and industrial areas etc. Responding to Comment C, the numbers in the text and category names in the Table 8D will be adjusted in the Final 2008 RTP.</p> <p>8 of 12 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>delay should not be the only measures for mobility. Higher speed causes more severe collisions, which causes more delay. Also, as per HCM, the maximum vehicle flow rate occurs at the critical speed, which is typically lower than the design speed.</p> <p>10 of 12</p> <p>a. Under Strategic Transit Service Policies, since the word significant is not defined in this document, it should probably not be used in this text. (p.16)</p> <p>b. Growing but Still Modest Public Transit Use section: Has public transit % of all trips increased or decreased? This is an important performance measure and if there is a decrease in the percentage of all trips for public transit, this may indicate the need to explore other strategies to increase the use of public transit. (p.65)</p> <p>11 of 12</p> <p>a. Project 8020 on Route 98, we have changed the description of the project. The new description should read as follows: "IN CALEXICO FROM 0.5 KM WEST OF DOGWOOD RD. TO 0.3 KM EAST OF ROCKWOOD AVE., WIDEN HWY FROM 1 TO 2 LANES IN EACH DIRECTION WITH RUN POCKETS AT MAJOR INTERSECTIONS". Also on this project it should state that the this project will be constructed in two stages. b. RTP ID IMP0021 on Route 78 the description should read as follows : "BRAWLEY BYPASS CORRIDOR-IN AND NEAR BRAWLEY FROM 0.5 MILES SOUTH OF BAUGHTMAN ROAD TO MEAD ROAD - 4LANE EXPRESSWAY ON SR 86 TO 0.3 MILES NORTH OF MEAD RD. ON SR 111". The only thing missing is the "NORTH".</p> <p>12 of 12</p> <p>a) First column, last sentence reads: "Unfortunately, our region's roadways, especially the State Highway System owned and operated by Caltrans, have not been maintained adequately." At the end of this sentence add "...due to constrained state and federal funding." b) Paragraph 4, under Aging Infrastructure, we thought it could best be said as in the following manner: "Our region's roadways, especially the State Highway System, owned and operated by CALTRANS, have been maintained, but other improvements are needed. Pavement surface damage requires an investment of \$64,000 per lane...." c) First column, end of first paragraph states, "...the number of trucks is projected to more than double for several major freeways." Add to the end of this, "...by 2030." d) Paragraph 2, Line 5, the statement that "freight rail does not add to freeway congestion..." is not accurate. There are many instances where freight rail has caused freeway congestion in Southern California. Hence, it should read, "Freight rail poses serious quality of life issues for many communities. Some communities witness 100 trains per day that are literally splitting communities into two sections for extended periods of time. This impact extends beyond the city boundaries which directly effects regional transportation." e) Under Air Quality, Climate Change, and Energy Challenges, restate as such: " The SCAG Region continues to have the worst air quality in the nation, despite improvements gained in the last two decades. f) System Monitoring and Evaluation section: The words "data collection" should be added to make it clear that it is one of the elements of</p>	<p>policies/strategies.</p> <p>Text and tables related to the policy growth forecast in the 2008 RTP have been removed from the document, including text referenced by commenter .</p> <p>Note however, that SCAG adopts a growth forecast as part of the RTP pursuant to federal transportation planning requirements, 23 CFR 450.322(c) and (e).</p> <p>9 of 12</p> <p>a. HOV lane-miles and centerline miles are provided in the Highways and Arterials supplemental report. b. The RTP conducts performance analysis for intermediate years between Base Year 2003 and the plan horizon of 2035, corresponding to the required regional emissions tests for transportation conformity. c. The RTP performance measures were developed by the Technical Advisory Committee and adopted by the Regional Council. Speed and delay are two commonly used measures that are relatively straightforward to calculate using the regional travel demand model and are easily understood. The RTP includes additional measures that specifically address safety and productivity. Additionally, see response above to Comment No. 1756 regarding the intended meaning of the term, "Projects in the Pipeline."</p> <p>10 of 12</p> <p>Comment noted. Transit trips have grown between 2000 and 2006 at a rate faster than population. According to U.S. Census data for the SCAG region, transit trips as a % of all commute trips has remained relatively steady over the past 25 years at just under 5%. The RTP transit and integrated land use strategies identified in Chapter 3 seek to increase the use of public transit.</p> <p>11 of 12</p> <p>Comments will be incorporated addressed into the RTP Project List.</p> <p>12 of 12</p> <p>a, c-f, k - requested changes will be incorporated into the Final 2008 RTP b, g, h, j, m, o, p – comments noted</p> <p>i – Table 2 is not an inclusive list of all emissions-reducing modes. The items listed in Table 2 are projects that comprise the "System Completion and Expansion" component of the Mobility Pyramid. Non-motorized transportation is discussed earlier, under the section "Integrated Land Use and Demand Management ."</p> <p>l – Refer to the Cross-Border Trade Activity section of the RTP Goods Movement Report available on SCAG's website.</p> <p>n – Comment noted. Value pricing is one of various strategies that can be used to better manage the demand on the transportation system.</p> <p>q – Comments noted. Data on bicycle injuries and fatalities are available in the RTP Transportation Safety Report on SCAG's website. SCAG will seek funding in its next Overall Work Program (FY08-09) to</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>system monitoring and evaluation. g) Integrated Land Use and Demand Management section: Dedicated dollar amount of funding should be listed for this element.</p> <p>h) Second bullet at top of page: Suggest adding wording to say, "Also need to create buffers between goods movement and logistics-related land uses from highly sensitive receptors such as neighborhoods, schools, hospitals, parks, etc. i) Table 2: Can't find where this is referred to in text but notice that bike, pedestrian, TDM, etc. is not included. These are important emissions-reducing modes and should be included. j) Aging Infrastructure section: second paragraph: The reference to Caltrans can be removed. Reference to ownership & operation of freeways are made on page 9. k) Second column, third paragraph, the word "behavior" is misspelled.</p> <p>l) Under mobility challenges the RTP discusses maritime ports and airports but it does not discuss land ports. m) We suggest that future updates move the air cargo analysis to the goods movement section, to be consistent with Section 3.19 of the RTP Guidelines (Goods Movement: Maritime/Rail/Trucking/Aviation). It would also enhance an understanding of the totality of the goods movement transportation system; and where air cargo fits within the system. n) "Value Pricing" is shown on the pyramid but is not addressed in the report. o) Quality travel time could be used as a measure, which is travel time in which the traveler has a pleasant and safe traveling experience, in a timely manner, and gets him to where he's going with minimum effort. For example, travel on a train that connects to a shuttle, or a convenient bicycle facility. Mobility has more to do with seamless connections between transportation systems and modes. For example, can a person ride his bicycle safely from his home to a transit station, take his bike on the train, exit the train at the nearest stop to his destination, and complete his trip safely and conveniently on a bicycle?</p> <p>p) Adding lanes to roadways may temporarily ease congestion, but it is not a long-term solution. Traffic calming measures on conventional highways can increase mobility by making the streets safer and friendlier to all users. q) Accessibility Measures: Is the route to work and school walkable and bikeable? (45 minute by car is way too far). Reliability Measures: Are transit lines running on schedule? Trains are inherently more reliable because they are not usually delayed by congested roadways. Productivity Measures: Roadway capacity for all modes, not just motor vehicles, transit capacity. Safety Measures: Should include bicycle and pedestrian collision data. Pedestrian and bicycle collisions are disproportionately high across the nation. Sustainability Measures: Do not just focus on performance, infrastructure condition, and preservation. Must focus on Social, Environmental, and Economic Sustainability. For example, tollways charging appropriate parking fees are more sustainable than free freeways and free parking. Storm water run-off, noise, air pollution are all major impacts that make roadways less sustainable. Cost Effectiveness: All costs need to be considered in cost/benefit analysis. There are always social, environmental, and economic costs of travel</p>	<p>assess the use of ITS technologies for tracking, reporting, and improving on-time performance of transit systems.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					alternatives.	
08-017	2/14/08	Chamberlain, Ryan	Caltrans District 12	Letter	<p>1 of 2 The Department accepts the baseline forecast as the foundation for the 2008 RTP modeling. This forecast is based on local input from the counties (i.e. CDR's OCP 2006 for Orange County). Other alternatives proposed by SCAG with local input are variations of the base scenario with socioeconomic data shifting within the region. Please keep in mind that the SED totals for the SCAG region remain virtually unchanged. The Department supports the SCAG Blueprint Planning activities. The projects listed in the Draft RTP Orange County section reflect the blueprint goals by enhancing and completing the State highway system, increasing connectivity of modes on and off the State highways</p> <p>2 of 2 The RTP should more clearly identify and quantify regional needs and expressed within both short and long-range planning horizons. Currently under the Transportation Strategy section (p. 77), the draft RTP identifies short term planning horizons as "projects in the pipeline" and long range planning horizons in table-formats by transportation mode.</p>	<p>1 of 2 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. As noted by commenter, the Baseline Growth Forecast is consistent with the local input, as documented in the 2008 RTP Growth Forecast Report, provided by sub regions and cities throughout the region. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 2 Comment noted. The RTP conducts performance analysis for intermediate years between Base Year 2003 and the plan horizon of 2035, corresponding to the required regional emissions tests for transportation conformity.</p>
08-018	2/14/08	De Rosa, Kathleen J.	Cathedral City	Letter	<p>1 of 6 The assumptions about grouping of population centers, while attractive, do not appear to be based on the economics of land development or jurisdictional priorities. The Draft Plan must recognize reality and complete the discussion of population migration. Your assistance in increasing identification and planning for the "spill over" growth into the Coachella Valley, Imperial Valley and eastern Riverside and San Bernardino high desert areas would certainly be appreciated.</p> <p>2 of 6 There appears to be no discussion in the Draft Plan about the impact visitors have on the six-county region and their contributions to local sales tax, transit occupancy tax and other forms of hidden revenue. These visitors, for either business or recreation purposes, enter the region through our airports, or by rail, automobile or bus and are undeniably a part of the overall transportation impacts that weigh on the existing infrastructure.</p> <p>3 of 6</p>	<p>1 of 6 Comment received and noted.</p> <p>2 of 6 SCAG recognizes that when visitors purchase gasoline for rental cars or purchase products subject to sales taxes, they are contributing to the regional economy. While their financial contribution is not delineated in the RTP Financial Plan as a separate line item, their revenue contributions are factored into the overall revenue forecast (state and federal gasoline tax revenues, as well as state and local sales tax revenues).</p> <p>3 of 6 Comment noted. The entire SCAG Region is included in the RTP's traffic and congestion analysis, which can be found in Chapter 5 of the 2008 RTP and in the 2008 RTP Highways and Arterials Supplemental Report.</p> <p>4 of 6</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>The Coachella and Imperial Valleys need to be identified as equal partners with the other SCAG urban centers in the regional planning process. The Draft Plan shows these integral SCAG counties merely as insets on each of the technical appendices, which does not allot the emphases these areas require with respect to the SCAG western region “spill over” that is occurring and will continue to occur. There are a number of sections of land in the Coachella Valley that are part of the Native American culture and are traffic generators within the Valley. These lands also seem to be omitted from traffic and congestion analysis.</p> <p>4 of 6</p> <p>The Palm Springs International Airport (Coachella Valley) was identified in the discussion of air transport facilities, along with other major airports in the SCAG region. There was no mention of the Jackie Cochran (Thermal) Airport. The Thermal Airport has land available for expansion but is not included in the discussion. The Airport is a current asset that could play a larger role in the movement of goods and people in the future.</p> <p>5 of 6</p> <p>The planned future truck lane on I-10 between Monterey Avenue Interchange and Dillon Road is noted in the RTP. There is no discussion, however, of the truck traffic issues from Dillon Road to the California border at the city of Blythe. Also lacking is a discussion of the potential development in the high desert east of the Coachella Valley. There is a significant need for a dedicated truck climbing lane in eastern Coachella Valley as I-10 climbs out of the Coachella Valley to the Cactus City.</p> <p>6 of 6</p> <p>There are several truck stops along I-10, such as those at Ramon Road and Dillon Road, where acceleration/deceleration lanes would be beneficial. One existing example is the westbound auxiliary lane on I-10 between the Monterey Interchange and the Ramon Road Interchange. Planning for additional auxiliary lanes for all of the interchanges along I-10 in the Coachella Valley would be beneficial for corridor preservation now while land is less expensive than it will be 20 years from now.</p>	<p>Thermal Airport was not included since non-commercial general aviation airports were not included in the 2035 forecasts for the 2008 RTP (SCAG will update forecasts for general aviation airports in the near future). If Thermal Airport is converted to a commercial airport, either air carrier or commuter, it will be included in future RTP forecasts for commercial airports.</p> <p>5 of 6</p> <p>Comment noted. SCAG will continuously work on the improvement of regional freight system and truck traffic flow by collaborating with all stakeholders.</p> <p>6 of 6</p> <p>Comment noted.</p>
08-019	1/23/08	Lopez, Rachel	Center for Community Action and Environmental Justice	Public Hearing	<p>I work at the Center for Community Action and Environmental Justice. I read in the paper the other day that the Colton Crossing was selected to be used with infrastructure on the P-1 monies, and I realize that SCAG has put together the draft of both Riverside and San Bernardino, and they come together with some projects, and I find it disappointing that they’re looking at spending taxpayer money or money that was approved by voters on a rail crossing that I feel that the railroad should be paying for not the community. The other issue that I wanted to talk about was the impact in our communities, and that I feel a lot of the projects that you’re looking at in our communities should be looked at a little closer, especially in Mira Loma, the west side of San Bernardino. Those communities are heavily impacted by this movement. Also the last time I looked, one of the earlier drafts of the RTP had a mention of an inland port into the Mira Loma area, and I know that I’ve spoken on it a couple times and asked that it be taken off your list. That particular inland port is across the</p>	<p>An inland port facility is one of the goods movement strategies in the 2008 RTP. A recent study conducted by SCAG considered the potential feasibility of an inland port. Mira Loma was identified as a preferred area because of the large number of logistics activities already concentrated there and the consequent potential of an inland port to reduce regional vehicle-miles-traveled (VMT). However, the study only identifies potential locations. Results of the study do not name Mira Loma or any particular site as a location for an inland port. The study indicates that scarcity of feasible, available sites and community concerns make Mira Loma an unlikely location for an inland port facility. Other areas such as those beyond the Inland Empire including Victorville and Barstow and North Los Angeles County may offer more realistic locations. We recognize that this is a sensitive matter and requires further analysis. With</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					street from the Mira Loma Village, heavily impacted by the truck traffic on Etiwanda and also the railroad, the Union Pacific, behind it. The last time they counted over 800 trucks an hour going past that particular community. That community is primarily Latino, Spanish speakers and we feel that community is already heavily impacted and should not even be looked at for any further projects, but particularly, on that side of the Mira Loma area.	regard to Colton Crossing and other rail capacity projects, SCAG recognizes that the private industry (the railroads) accrue substantial benefits and should pay their share of the cost of these improvements. SCAG's proposed rail business case, listed as Appendix F in 2008 RTP Transportation Finance Supplemental Report, highlights the importance of proper cost allocation to develop a sound public private partnership framework.
08-020	1/22/08	Gayk, Ph.D., William F.	Center for Demographi c Research	Public Hearing	I'm just here to speak in support of the consensus that is emerging in the region and that is for the baseline forecast to be adopted as within the RTP; and that the advisory -- and that the policy forecast are approved for advisory numbers only.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-021	2/14/08	Diep, Deborah	Center for Demographi c Research	Letter	1 of 13: We strongly encourage, along with Orange County agencies, that the staff recommendation to the Community, Economic and Human Development Committee (CEHD) and Regional Council be to adopt the Baseline forecast which contains the local input for Orange County, was created through a bottoms-up process, is based on local land uses, and already incorporates regional principles and policies. At the November 1, 2007 meeting of the CEHD, the committee approved the release of the 2008 RTP draft baseline and draft policy growth forecasts for public review and comment. The staff report for this item stated the following: •“The draft baseline growth forecast for the 2008 RTP represents the most likely growth distribution” •“The proposed draft baseline growth forecast reflects local jurisdiction/subregion projections and vision, while there is room on an advisory and volunteer basis for a regional land use strategy, or vision to bring additional mobility benefits, relief congestion, and improve quality of life throughout the region.”•“The draft policy growth forecast for 2008 RTP calls for an advisory redistribution of growth at the county, subregion, city, and TAZ levels from the baseline growth forecast.”•“This advisory policy growth forecast utilizing Compass Blueprint land use strategies and principles, focuses on geographic specific locations with transportation/transit advantage, including the interaction between transit network and employment centers.” •“This policy growth forecast, consistent with Compass Blueprint land use principles is advisory; its implementation would be voluntary and compliment to the baseline growth forecasts based on local jurisdiction/subregional input.” SCAG staff's report supports the use of the Policy forecast/Plan scenario in an advisory capacity. Adoption of the Policy growth forecast (Plan scenario) for use in the RTP would result in mandating the “Plan” policies. Therefore, the only way to retain the Plan scenario as advisory and voluntary would be to adopt the Baseline forecast for use in the 2008 RTP. PAGE REFERENCE: RTP p. 55; Integrated Growth Forecast & Regional Land Use Policies Report p. 11 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “The policy growth forecast calls for an advisory redistribution of growth at the county, subregion, city, and transportation analysis zone (TAZ) levels. The implementation of the policy growth forecast would be voluntary and it complements the baseline growth forecast.” COMMENT & RECOMMENDATION: The RTP document	1 of 13 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006,as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document. 2 of 13 The term “business as usual” as a characterization of the Baseline Growth Forecast, has been removed from the 2008 RTP, including the 2008 RTP Growth Forecast Supplemental Report (formerly titled Integrated Growth Forecast and Regional Land Use Policies Report). 3 of 13 See response number 1 of 13. 4 of 13 The study cited in the Executive Summary and Chapter 2 of the 2008 RTP is from Personal Communication, Richard Bode, California Air Resources Board, 2007, and it has been footnoted in the RTP. 5 of 13 The study cited in the Executive Summary and Chapter 2 of the RTP is from the Victoria Policy Institute, Transportation Demand Management Encyclopedia; it has been footnoted in the RTP. 6 of 13 Page 47 of the Draft 2008 RTP, Integrated Growth Forecast and Regional Land Use Report, has been removed from the 2008 RTP. 7 of 13 Comment noted. 8 of 13 Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008. 9 of 13 The RTP PEIR included mitigation measures to minimize the significant adverse impacts, and includes where relevant, inefficient

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>states the policy growth forecast or “Plan” forecast would be advisory and voluntary. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.TOPIC: Adoption of Baseline forecast (local input) PAGE REFERENCE: RTP p. 86 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE:" In order to yield transportation model performance that legitimately account for the resulting air quality benefits, the assumptions must be: 1) reasonable and realistic; 2) based on the best and most up-to-date information; and 3) must be consistent with planned transportation infrastructure.” COMMENT & RECOMMENDATION: The Baseline forecast is based on local input from all SCAG subregions and supports these assumptions. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP. TOPIC: Adoption of Baseline forecast (local input) PAGE REFERENCE: RTP p. 86 RTP NARRATIVE, COMMENT & RECOMMENDATION:RTP NARRATIVE: “assumptions are consistent with planned transportation infrastructure” COMMENT & RECOMMENDATION: The local input contained in the Baseline forecast is consistent with what CTCs used in planning their transportation projects. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.TOPIC: Adoption of Baseline forecast (local input) PAGE REFERENCE: RTP p. 89; Integrated Growth Forecast & Regional Land Use Policies Report p. 45 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “implementation efforts are ultimately in the hands of local governments ... While local land use decisions are outside of its purview, SCAG plans to influence growth patterns through a number of actions that will require collaboration at all levels of both public and private entities.” COMMENT & RECOMMENDATION: If implementation of the Plan scenario/Policy forecast is up to the local governments, this implies the Policy forecast is voluntary and the local input (Baseline forecast) should be used within the RTP rather than mandating policies in the “Plan”/policy forecast. If SCAG does not have local land use authority and supports jurisdictions’ local control, then the Policy forecast should continue to be advisory and the Baseline forecast should be adopted as the growth forecast for the 2008 RTP. 2 of 13:</p> <p>The Draft 2008 RTP, the Environmental Justice Report and the Integrated Growth Forecast and Regional Land Use Report state the Baseline forecast is “business as usual”. The reports further discuss that the Baseline forecast, which includes local input from all six counties, is similar to the status quo and is not influenced by regional policies. This is not the case. Rather, Orange County jurisdictions have made significant efforts since the 2004 RTP to include projects that are consistent with regional policies and principles endorsed by SCAG. In the Baseline forecast, Orange County shows: •91% of the household growth in Orange County will be focused into 14% of its land area • Almost half (48%) of the job growth will be concentrated into 5% of the land area • 70% of the household growth will be multi-family • The county’s distribution of single-family detached to multi-family will decline from 51% to 49%. TOPIC: Business as Usual PAGE REFERENCE: RTP p. 62, 161 Integrated Growth Forecast & Regional Land Use Policies Report p. 11, 25, 28 RTP</p>	<p>and unnecessary consumption of energy as required by CEQA 15126.4(a). The text on the page referenced has been edited based on the comments. 10, 11, 12 of 13 The Baseline scenario is defined in detail on page 161 of the Draft RTP. The definition of the RTP Baseline is consistent with federal requirements as defined in the transportation conformity rule (40 CFR 93.119). The RTP Baseline represents a future scenario in which the RTP is not implemented and allows for comparison with a future scenario in which the RTP is implemented. 13 of 13 The discussion in Chapter Five of the Draft RTP (which continues through page 172) references Figures 5.9 through 5.11, which compares the Plan (the preferred set of transportation investments) with the baseline growth forecast versus the Plan with the policy growth forecast. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “It [Baseline scenario] would yield a growth scenario very similar to the status quo, taking a somewhat “business as usual” approach” “The Baseline represents “business as usual” “The Modified 2004 RTP Growth Scenario represents one possible version of the region’s growth between 2005 and 2035 based on the previously adopted 2004 RTP forecast distribution.” COMMENT & RECOMMENDATION: Page 88 of the RTP states “the [Plan] policies reflect current development patterns in some portions of the region and nascent planning strategies in others.”</p> <p>Page 40 of the Integrated Growth Forecast report states “with most cities that are undertaking General Plan updates moving towards adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision.” Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles which are the foundation of the Plan forecast. These projects deviate from the long-time pattern of “urban sprawl” which is how the Baseline forecast is described. The characterization of the Baseline forecast as “business as usual” is misleading and should be removed. The Modified 2004 RTP, which is an extension of the 2004 RTP growth forecast out to Year 2035 (the horizon year for the 2008 RTP), is a more appropriate characterization of business as usual. TOPIC: Business as Usual PAGE REFERENCE: RTP p. 87; Integrated Growth Forecast & Regional Land Use Policies Report p. 41 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “Based on the land use assumptions developed by SCAG and its local partners, the Regional Council adopted the following set of policies to be incorporated into Compass Blueprint and used in developing the 2008 RTP Policy Growth Alternative” “These policies were founded upon the Compass Principles developed through the regional growth visioning efforts in preparation for the 2004 RTP. • [1] Identify regional strategic areas for infill and investment. o Transit Oriented Development o Existing and emerging centers o Small mixed use areas • [2] Structure the future plan on a three-tiered system of centers development: Existing, Planned, Potential • [3] Develop “complete communities” • [4] Develop nodes on a corridor • [5] Plan for additional housing and jobs near transit • [6] Plan for a changing demand in types of housing • [7] Continue to protect stable existing single family areas • [8] Ensure adequate access to open space and preservation of habitat • [9] Incorporate local input and feedback on future growth • [10] Promote land use patterns supportive of goods movement and logistics industries” A summary of the primary tenets include: • [A] Improve the localized balance between jobs and housing • [B] Increase potential transit ridership by focusing growth to transit supportive areas – LRT, BRT, Metrolink • [C] Enhance existing and emerging employment and residential centers • [D] Shift the balance of new development from low density single-family housing to mixed-use and higher density housing • [E] Maintain stable single-family areas • [F] Minimize new separate use commercial or residential development in outlying areas • [G] Minimize very high density development in areas that are not effectively served by transit or are not within identified employment</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>centers” COMMENT & RECOMMENDATION: Table 3 below contains an abbreviated list of projects contained within the Baseline forecast which serve as examples of implementation of the policies and tenets labeled above. The characterization of the Baseline scenario as “business as usual” should be removed. See original letter for table of jurisdictions and projects consistent with Compass Policies and Tenets.</p> <p>3 of 13:</p> <p>County and small area comments on the Growth Forecasts. The Baseline growth forecast contains local input from all counties within the SCAG region, including the 2006 Orange County Projections. The Baseline forecast was drafted from a bottoms-up process which utilized information based on local land use, current trends and long-term plans. This forecast represents the most likely pattern and distribution of growth envisioned by local governments in the SCAG region. The Policy growth forecast, referred to in the draft 2008 RTP as the “Plan” forecast, represents SCAG’s vision of how growth could be re-distributed in the SCAG region from the local input reflected in the draft Baseline growth forecast. The Plan scenario/Policy forecast calls for 45,000 people, 9,500 jobs and 15,000 households to be removed from Imperial, Riverside and San Bernardino Counties and placed into Orange County. This additional growth is beyond what is forecasted by Orange County jurisdictions. In addition, the distribution of housing, population, and employment in the Policy forecast is contrary to many planned developments already approved and underway in and outside of Orange County. The map in Attachment 1 provides a county-level view of the differences between the Baseline and Policy forecasts and how job growth was redistributed at the census tract level throughout Orange County. The Policy forecast adds 9,500 more jobs into the County over the growth projected by local jurisdictions based on General Plans, and approved and proposed developments. As can be seen by the grey shaded areas throughout the county, job growth was reduced in the majority of the county and refocused into areas near freeways, train stations and employment centers. Full size wall maps may also be provided upon request. The map in Attachment 2 also shows the redistribution of households in Orange County between the Baseline and Policy forecasts. In addition to the 137,000 households planned in Orange County, the Policy forecast increases the projected growth by over 15,000 households. The grey shaded areas seen throughout the county represent areas where household growth was reduced and then refocused into areas near freeways, train stations and employment centers represented by shades of green. TOPIC: Policy growth forecast errors</p> <p>PAGE REFERENCE: Integrated Growth Forecast & Regional Land Use Policies Report p. 1 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “Using an integrated growth forecasting approach and consensus-built growth visioning process ...The growth assumptions, vision and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground “reality checks.” COMMENT & RECOMMENDATION: The above narrative describes the process that created the Policy forecast/Plan scenario. Review of the Policy forecast dataset at the</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>TAZ/Census tract level (released on November 1) shows the Policy forecast contains errors. Suggested corrections to these errors are contained in Attachment 3 (an Excel data file containing corrections to geographic areas within the Plan forecast). The following are examples of specific errors: •San Clemente: 7,621 jobs and 3,278 additional households placed into city where restrictions such as historical preservation districts, the Coastal Commission and topology would prevent this magnitude of additional growth (CT 421.06, 421.08)•Huntington Beach: 8,660 jobs and 2,843 households placed into city where growth is unlikely to occur, including wetlands areas. •Rossmoor, an unincorporated community in west Orange County: additional 1,288 jobs and 824 households into 1.6 square mile built-out community •Residential development in restricted areas within John Wayne Airport flight path TOPIC: Policy growth forecast land use assumptions PAGE REFERENCE: Integrated Growth Forecast & Regional Land Use Policies Report p. 18 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “Prior to formulating the 2008 Plan Alternative and assessing its transportation benefits, the appropriate land use assumptions were established.” COMMENT & RECOMMENDATION: Review of the land use maps associated with the Policy growth forecast has identified key problem areas. Examples are: •CT 866.01- fully built tract available only for reuse. Policy plan shows 562 additional households with main street uses, city residential, and city neighborhood. Uses are highly unlikely due to existing regional hospital, supporting medical offices, and high density residential (36 units/acre). Reuse to achieve +562 households would require densities greater than 36 units/acre or demolition of hospital and medical office site, both unlikely for area. In Irvine: •Approved General Plan Amendment has residential and mixed use in Spectrum, maps show only Office Park use •Great Park and Heritage Field have designated open space areas not listed •Woodbury should be all residential and open space reserve, not office park•IBC is high end office and going for town center; Policy shows all industrial and decreases in jobs that are unlikely. TOPIC: Policy growth forecast errors PAGE REFERENCE: RTP p.41 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: Development of the 2008 Policy Growth Forecast began with the Workshop Scenario, which represented the closest representation available of regional consensus on how and where growth should occur. COMMENT & RECOMMENDATION: Orange County workshop input overall reflected and requested the inclusion of the 2006 Orange County Projections. The Workshop Scenario does not reflect the feedback provided by the Orange County jurisdictions. For Orange County, the Workshop Scenario should be identical to the Baseline forecast. TOPIC: Policy growth forecast errors PAGE REFERENCE: RTP p. 41 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “...the land use distribution [of the Plan forecast] is also informed by the results of research performed at a local scale during 2006 and 2007. The primary sources of this research include dozens of Compass Demonstration Projects, where SCAG supported local planning initiatives consistent with these regional goals, and a “reality check” process to explore, in depth, the relationship between local</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>general plans, the RTP and recent demographic trends.” COMMENT & RECOMMENDATION: One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the policy forecast dataset shows a number of errors in growth projected. Attachment 3 contains an Excel data file highlighting significant differences between the local input (Baseline forecast) and the Plan’s Policy forecast. Please change Policy forecast to reflect Baseline projections. TOPIC: Policy growth forecast errors PAGE REFERENCE: RTP p. 42 RTP NARRATIVE, COMMENT & RECOMMENDATION: RTP NARRATIVE: “The local knowledge was critical in documenting so called “pipeline” development that is either already underway or has gone significant distance toward entitlement. These pipeline projects are all but guaranteed to happen.” COMMENT & RECOMMENDATION: The Plan scenario/Policy forecast used portions of the TOD/Centers and Envision growth alternatives yet in doing so, redistributed growth throughout the region such that the following approved and currently under development projects were significantly altered:</p> <ul style="list-style-type: none"> •Large portions of growth in the adopted Ranch Plan (Rancho Mission Viejo) in unincorporated south county were relocated (320.23 & 320.56) to other Orange County locations: 11,300 jobs moved from the Ranch Plan into Irvine, Laguna Beach, Newport Beach, San Clemente, San Juan Capistrano 8,914 households moved from the Ranch Plan into Irvine, Lake Forest, Laguna Hills, Mission Viejo, Laguna Niguel, San Juan Capistrano, Dana Point, San Clemente •Irvine: approximately an additional 11,000 jobs and 6,600 households added into the city in areas under current development, planned through development agreements, or open space. •Anaheim’s Platinum Triangle: Plan forecast has over 2,200 fewer households than projected in local plans; City expects significant increase in housing and employment as a result of recent amendment to Platinum Triangle Master Land Use Plan. Detailed review of the Policy forecast dataset generated the site specific comments and errors listed [in the original letter]. Please adjust Policy forecast to correct these. See also Attachment 3 for corrected dataset. <p>4 of 13: RTP p. 10 and RTP p. 70: RTP NARRATIVE:5,400 premature deaths COMMENT & RECOMMENDATION: Please cite the study.</p> <p>5 of 13: RTP p. 11: RTP NARRATIVE: “Mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year.” COMMENT & RECOMMENDATION: Please cite the study.</p> <p>6 of 13: RTP p. 91; Integrated Growth Forecast & Regional Land Use Policies Report p. 47: RTP NARRATIVE: “Strategic Initiative: ... SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint.” COMMENT & RECOMMENDATION: In Orange County, OCTA Board approval would be required before OCTA could spend transportation dollars on development projects that support the Compass Blueprint Program, and there is no precedent for OCTA funding such</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>projects. Please delete reference to County Transportation Commissions.</p> <p>7 of 13: RTP p. 104: RTP NARRATIVE: "The changes in land use patterns around our transit investments, referred to transit oriented development (TOD), indicate a result that leads to less auto trips and reduced vehicles miles traveled (VMT) through greater transit use, increased substitution of walk trips, and improved access to local jobs and services." The comment should be clarified to state where this conclusion comes from: whether from modeling results of existing TOD or modeling results of future growth scenarios.</p> <p>8 of 13: RTP p. 117: RTP NARRATIVE: Orangeline High-Speed Transit COMMENT & RECOMMENDATION: Per recommendation of the OCTA Board on 1/28/2008 and subsequent RTP comment letter, remove this project from Constrained Plan and place in Strategic Plan.</p> <p>9 of 12: RTP p. 132: RTP NARRATIVE: "The RCP details ... these recommendations are included in the EIR as mitigation measures." COMMENT & RECOMMENDATION: The Regional Comprehensive Plan has not been adopted by the Regional Council nor has the public comment period been completed. Mitigation measures based on the RCP that are included in the RTP should be removed.</p> <p>10 of 13: RTP p. 27: RTP NARRATIVE: "• Baseline 2035 scenario—Future conditions in 2035 based on the existing transportation system and near-term constrained projects • Plan 2035 scenario—Future conditions in 2035 based on the existing transportation system, near-term constrained projects, and long-term constrained projects In every category, the Plan 2035 scenario shows improvement over the Baseline 2035 scenario." COMMENT & RECOMMENDATION: In order to make accurate comparisons of the outcomes between the Baseline and Plan scenarios, the Baseline scenario should include long-term constrained projects.</p> <p>11 of 13: RTP p. 167: RTP NARRATIVE: "This improvement in accessibility is primarily due to the Land Use Integration strategy" COMMENT & RECOMMENDATION: In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.</p> <p>12 of 13: RTP p. 170: RTP NARRATIVE: "For each of these categories, models are used to estimate the benefits of the Plan compared to Baseline." COMMENT & RECOMMENDATION: In order to compare the Baseline and Plan scenarios, the list of constrained projects would have to be identical. Page 27 of the RTP (see</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The Baseline scenario must include the long-term constrained projects (which the Plan scenario includes) in order to properly evaluate the differences between the two scenarios. COMMENT & RECOMMENDATION: The statement above should be clarified to state where this conclusion comes from: whether from modeling results of existing TOD or modeling results of future growth scenarios. 13 of 13: RTP p. 170: RTP NARRATIVE: "The comparison of the transportation modeling results between the Baseline Growth Forecast Alternative and the Policy Growth Forecast Alternative isolates the transportation benefits due to regional land use policy." COMMENT & RECOMMENDATION: In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.	
08-022	1/10/08	Lee, Laura	Cerritos, City of	Multiple Signers	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-023	2/19/08	Lopez, Robert	Cerritos, City of	Letter	On Thursday, February 14, 2008, the City of Cerritos was provided with maps depicting the Draft Baseline Growth Forecasts and the Draft Policy Growth Forecasts for the Gateway Cities Council of Governments (GCCOG) sub-region. The attached table accompanying this letter outlines specific comments and corrections to the Draft Policy Growth Forecasts map. Given the sub-regional scale of the map, it is difficult to read exactly which parcels are proposed for specific land uses in the Draft Policy Growth Forecasts scenario. We have made the best attempt to guess which specific areas are targeted and have provided comments accordingly on the attached table. Assumed Location: Southeast corner of Bloomfield Avenue and Artesia Boulevard Comment: This area contains commercial retail uses and is not suitable for "City Neighborhood" uses as proposed on the draft map. Assumed Location: Northeast corner of Studebaker Road and Del Amo Boulevard Comment: This property is a Southern California Edison (SCE) substation containing overhead power lines and is thus not suitable for "Industrial" uses or any other development containing permanent structures. Assumed Location: Southern side of South Street between Studebaker Road and the City of Artesia boundary Comment: This area contains new commercial retail uses and is not suitable for "Office Park" uses as proposed on the draft map.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Cerritos is consistent with the local input provided by subregions and cities within Los Angeles County, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-024	2/19/08	Kellison, Michael T.	Chino, City of	Letter	Thank you for providing the City of Chino an opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR) for the	Comment noted. This RTP does not include a discussion of the referenced transit facilities the referenced s.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					2008 Regional Transportation Plan (RTP). Based upon staff's review of the project, the City of Chino has the following comments: In 2005, the City of Chino opened the Chino Transit Center, which today function as a hub for Omnitrans and Foothill Transit, and in the future will provide connections to Metrolink stations throughout the region. Please ensure that the Chino Transit Center is properly recognized in the RTP and the traffic that the Chino Transit Center is properly recognized in the RTP and the traffic impacts are considered in the supporting environmental documents. Since the development of the 2004 RTP, Chino has planned for tremendous growth in two specific plan areas of the City. The Preserve and College Park Specific Plans will add approximately 12,000 new units to the City over the next couple decades. Several amendments have been made to these specific plans since their adoption, so it is critical the SCAG has the most up to date information when considering regional growth. Additionally, the City is in the middle of a comprehensive update to its General Plan, which will also add growth and impact transportation in the region. Please analyze the projected impacts resulting from increases goods movement along the 60 Freeway, State Route 71, and State Route 83 (Euclid Avenue). Impacts on the City's local roadway infrastructure will occur on Central Avenue, Ramona Avenue, Mountain Avenue, Chino Avenue, Edison Avenue, Chino Hills Parkway, and Pine Avenue, on both on and off-ramps leading to and from the affected arterials.	
08-025	2/19/08	La Belle, Douglas N.	Chino Hills, City of	Letter	Pine/Schleisman Corridor: The RTP includes some segments of this project such as the Pine Avenue Extension between SR-71 and SR-83, but does not recognize the corridor in its entirety. Recognizing the entire transportation corridor between SR-71 and I-215 demonstrates the importance of the entire corridor to easing traffic congestion and in turn, enhancing air quality in area. Widening of SR-71 from the San Bernardino/Riverside County Line to SR-91: Although the ultimate widening of this section of SR-71 is identified in Caltrans' system master plan, there is no program date of this improvement. This project is essential to maximizing the benefit of the Pine/Schleisman Corridor. Failure to address this segment in conjunction with specifically identified projects has potentially negative environmental impacts including increased traffic congestion; degradation of air quality; and increased noise impacts to adjacent residential areas. Widening and off ramp improvements to SR-71 and SR-57 to SR-60 (in the City of Pomona and Los Angeles County): This project would enhance mobility for both commercial traffic and residents of the Inland Empire to and from the Los Angeles area.	Comment noted.
08-026	2/18/08	Stoney, Diana	Citizens United to Save South Pasadena	Letter	1 of 4: The Southern California Association of Governments (SCAG) needs to accept some responsibility for population growth. Government agencies are famous for claiming they are only responding to existing conditions. This denial of responsibility implies that nothing can be changed. The truth is that for the survival of our country and the planet, everything must change. As recently as three (3) years ago SCAG held a workshop where each of the San Gabriel Valley cities was pressured to create higher density housing to accept population growth. Now claiming the growth that their policies encouraged to	1 and 2 of 4 Comment noted. 3 of 4 SCAG recognizes the importance of grade separation projects and appropriately identifies critical investments as a part of the regional freight rail investment strategy. SCAG is exploring the use of a high-speed regional transport (HSRT) system that may provide a near zero-emissions alternative for moving freight from the San Pedro Bay ports. (See Goods Movement and High-Speed Regional

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>be an “existing condition” SCAG is responding with 56-year old freeway dinosaurs.</p> <p>2 of 4: In today’s world, priority must be given to mass transit projects. Caltrans has admitted that they cannot build their way out of congestion. The answer to gridlock pollution is for SCAG to give highest priority to innovative mass transit projects such as the Flyaway Buses, which coordinate several transit systems. The Gold Line completion to the Ontario Airport and the Purple Line “subway to the sea” projects should be given priority funding status.</p> <p>3 of 4: Grade separation projects should also be given priority funding status, both for efficiency and safety. Innovative solutions such as the non-polluting Texas Transportation Institute’s SAFE Freight Shuttle* from shipside to distribution centers are particularly needed for goods movement. Restructuring of the cost schedule for the Alameda Corridor to promote maximum utilization is key to efficient goods movement while reducing freeway truck traffic. Then emphasis must be placed on grade separation of the Alameda Corridor East.</p> <p>4 of 4: While unwilling to commit to a mass transit solution, SCAG has become so enthusiastic about a freeway approach that they have thrown both caution and ethics to the wind. Representations were made at public meetings promising a study of extending the SR-710 via tunnels, never the less the final product could at best be described as a mere concept paper. Consequently, “preliminary engineering and technical studies” have been authorized to answer the questions not adequately addressed in the first study. The MTA (METRO) assured the public that none of these studies would be used as an Environmental Impact Report (EIR) and that a full EIR process would be required. To try to subvert either process or law by declaring a “demonstration project” only adds to the public’s growing perception of government corruptness. Any proposal that moves the SR-710 Gap Closure project from the Strategic Projects into the Constrained Projects portion of the RTP based on projected future changes in law breaks the public’s trust in any promises made by government at any level. Once the public’s trust is broken, future funding for any project is in jeopardy. We urge you to reconsider your actions.</p>	<p>Transport System Reports, Final 2008 RTP Appendices.) Comments noted about restructuring of the cost schedule for the Alameda Corridor.</p> <p>4 of 4 Comment noted. The 2008 RTP is a performance based multi-modal plan that incorporates transit and highway components to achieve improved system performance.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-027	2/19/08	Garcia, Robert	City Project, The	Letter	<p>We respectfully submit that the cited SCAG reports are not adequate to address the impact of the regional transportation plan on environmental justice communities including low income people, people of color, and Native Americans, on open space needs, and on the need for transit to trails. The reports need to be significantly revised, as discussed in the conclusion. There are unfair inequities in the distribution of environmental benefits, including green space, and environmental burdens, including air and ground pollution, between more and less affluent communities in California. Four of the six SCAG counties are among the eight counties in the state with the greatest need for green space – in combined terms of the fewest acres of green space per thousand residents, and highest levels of child obesity, youth, poverty, and people of color. These facts are illustrated and analyzed in the accompanying Policy Report by Robert García and Aubrey White, Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California at pages 3-6, Map 1, and Tables 9A-9F. County averages can mask dramatic disparities in access to green space within the county. As reported in the Los Angeles Times, for example, there are large disparities in the amount of park acreage for L.A. residents. See generally Robert García and Aubrey White, Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region at pages 3-5, 7-10, and Maps 101-102, 401, 402, 403, and Charts 401C and 1203C (2006). In addition, California has the nation's highest concentration of people of color living near hazardous waste facilities. Statewide, 81% are people of color. Greater Los Angeles is the worst in the nation, with 1.2 million people living less than two miles from 17 hazardous waste facilities. 91%, or 1.1 million, are people of color. Robert García and Aubrey White, Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California at 6-7.</p> <p>Southern California should develop and implement a strategic plan for a "Transit to Trails" program to take people to parks, beaches, forests, lakes, and other public natural spaces. A Transit to Trails program would serve all the people of the region, but would be particularly useful to the working poor with limited or no access to cars, who are disproportionately people of color and low income. Transit to Trails would reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean. It would also reduce dependency on the automobile and fossil fuels. Today, there is virtually no good way to reach the four Southern California forests using public transportation. Transit to beaches is limited, time-consuming, and expensive. Low cost transit service should link great urban parks with outlying green space. SCAG has the opportunity to include Transit to Trails in its next Regional Transportation Plan. The Olmsted Report envisioned a transportation system for people to reach natural public places. Robert García and Aubrey White, Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region at 14. The values at stake in providing equitable transportation and land use planning for the region include promoting the simple joys of playing in the park; human health; youth development and academic performance; conservation values of clean</p>	<p>The intent of the 2008 RTP Environmental Justice Analysis is to inform transportation decisions so that low-income and minority communities have ample opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2008 RTP Environmental Justice Supplemental Report evaluates region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits or burdens various demographic groups are anticipated to experience as a result of the RTP. For a detailed description of the results, please refer to the 2008 RTP Environmental Justice Supplemental Report. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications. SCAG will continue to work with stakeholders to address Environmental Justice in the transportation planning process. Note that SCAG's advisory land use policies and strategies included in the Final 2008 RTP, address developing "complete communities" and nodes on transportation corridors, to create more opportunities for walking, bicycling, or using transit.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>air, water, and land, habitat protection, and climate justice; economic vitality for all; spiritual values in protecting people and the earth; and sustainable regional planning. Fundamental principles of equal justice and democracy underlie each of these other values. Robert García and Aubrey White, Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California at 7-9. Providing equitable transportation and land use planning for the region is good policy – and good law. Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The SCAG RTP process can proactively achieve compliance with civil rights, environmental, and other laws. Robert García and Aubrey White, Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California at 9-10. Title VI of the Civil Rights of 1964 and its implementing regulations guard against both (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds. Id. California laws also guard against intentional discrimination and unjustified discriminatory impacts by recipients of state funds under Government Code section 11135. In addition, California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” Id. The California Coastal Commission adopted a local coastal plan requiring Malibu to maximize public access to the beach while ensuring the fair treatment of people of all races, cultures, and incomes in 2002. Commissioner Pedro Nava told the Los Angeles Times he hoped to set a precedent for other communities. Id. SCAG should be increasingly responsive to, and held accountable for, the impact of its plans on environmental justice communities, especially now that people of color are in the majority in California. Id.</p> <p>The SCAG RTP, EIR, and Open Space plans and Environmental Justice Report should present a region-wide vision and strategic plan for the investment of transportation resources to alleviate real and perceived inequities in access to green space and transportation. The principles below in many respects present the necessary framework. Principle 1. Transportation resource decisions have widespread impacts on health, housing, development, investment patterns, climate justice, and quality of life. The process by which those decisions are reached, and the outcomes of those decisions, must be fair and beneficial to all. Principle 2. Transportation investments should be guided by a regional vision for a comprehensive web of communities, parks, schools, beaches, forests, rivers, mountains, and transit to trails to achieve results that are equitable; promote human health, the environment, and economic vitality; and serve diverse community needs. Principle 3. Infrastructure areas should be planned together in complementary rather than conflicting ways to serve</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>health, education, human service, and environmental needs; to fulfill critical governmental and societal responsibilities; and to produce equitable results. For example, transit can provide access to trails. Principle 4. Transportation priorities should be thoroughly assessed through an equity lens. For example, there are unfair disparities in transportation access, green space, and child obesity. Principle 5. Employment, economic, and environmental benefits associated with building and maintaining transportation infrastructure should be distributed fairly among all communities. Local jobs with livable wages should go first to local residents. Job training should be provided for those who need it to qualify for jobs. There should be a level playing field for small, women, and minority business enterprises. Principle 6. Revenues to support transportation improvements should be collected and allocated to distribute fairly the benefits and burdens of the projects. Resources should be targeted to the most underserved communities to overcome unfair disparities. Principle 7. Transportation infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process. Principle 8. Standards for measuring equity and progress should be articulated and implemented to guide planning and investments, and to hold agencies accountable. Principle 9. In making transportation investments and decisions, recipients of federal and state funds including SCAG should proactively comply with federal and state laws designed to achieve equal access to public resources, including Title VI of the Civil Rights Act of 1964 and its implementing regulations, California Government Code 11135, and the California statutory definition of environmental justice. Compliance with civil rights, environmental, and other laws should be combined. Principle 10. Government agencies including SCAG should dedicate resources to enable community based organizations to serve their communities and actively participate in infrastructure planning and investments. We look forward to working with you to accomplish these goals.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-028	2/19/08	McMillan, Catherine	Coachella Valley Association of Governments (CVAG)	Letter	<p>1 of 5 CVAG would like to see more emphasis on the importance of the CVAG jurisdictions as an expanding population center for the region, included in the Plan. CVAG is very concerned with SCAG discussions of intent to adjust and manipulate the approved baseline forecast, to a "policy" forecast. With the "policy" forecast, thousands of Riverside County's expected population growth would be shown as population numbers, residing in the coastal communities of Southern California. . The "policy" forecast plan concerns CVAG greatly, along with the consequences of transportation funds inappropriately transferred to coastal areas, taking away from Riverside County, where the actual growth is taking place.</p> <p>2 of 5 Correct and accurate airport information needs to be added to the RTP. Specifically, the CVAG subregion has the Palm Springs International Airport, located in the city of Palm Springs, along with the General Aviation Airports located in the eastern areas of Riverside County, east of the Coachella Valley. Airports are located in Thermal, Blythe, Chiraco Summit, and Desert Center.</p> <p>3 of 5 With the many approved CVAG and Coachella Valley RTIP, RTP and Arterial Projects submitted by the Riverside County Transportation Commission (RCTC) for the growing CVAG areas, we have identified an RTIP project that has been left out. In the city of Indian Wells, west city limits to Cook Street, widen from four to six lanes, by 2012, with a cost of \$1,082,000. Please add this project to the corrected RTP Plan.</p> <p>4 of 5 To the Riverside County Strategic Plan Projects, CVAG is requesting the addition of two projects that we have been assured by SCAG, would be included in the 2008 RTP. The Palm Springs International Airport must be added to the High Speed Rail connections of the other Southern California major airports. With a population that will reach one million in the next twenty years, and as a major tourist destination, the Palm Springs International Airport must be included in the High Speed Rail plans.</p> <p>5 of 5 CVAG is requesting plans for Truck Climbing Lanes, on I-10, near the Chiraco Summit and Blythe areas, be included in the 2008 RTP. We are all aware of the volume of trucks involved with goods movement in these areas, and the serious accidents caused by trucks slowing automobile traffic in this segment of I-10, east of the Coachella Valley, in eastern Riverside County.</p>	<p>1 of 5 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the Coachella Valley is consistent with the 2006 RCP, as documented in the 2008 RTP Growth Forecast Report, provided by the Riverside County Transportation and Land Management Agency (RCTLMA). All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>2 of 5 The RTP displays and contains facility and activity information on Palm Springs International Airport, including 2035 demand forecasts. It does not contain information on non-commercial general aviation or military airports since 2035 demand forecasts were not developed for those airports.</p> <p>3 of 5 The referenced project will be added to the Final 2008 RTP Project List.</p> <p>4 of 5 The RTP will indicate Palm Springs International Airport as a station in the Strategic Plan's High-Speed Regional Transport system.</p> <p>5 of 5 The RTP will include Truck Climbing Lanes on I-10 in the Coachella Valley in the Strategic Plan, subject to TCC and Regional Council approval on May 8, 2008.</p>
08-029	2/14/08	Kimberley, Brandt	Costa Mesa, City of	Letter	<p>The City of Costa Mesa has reviewed the Growth Forecast Maps provided by SCAG and the Center for Demographic Research and has concerns with regard to the distribution of households. The following are the City's comments on the Policy Growth Forecast Maps (Please see attached for specific recommended numeric adjustments). [See attachment for breakdown]</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Costa Mesa is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-030	2/18/08	Corlin, Alan	Culver City, City of	Letter	<p>1 of 3: Culver City is pleased to note that all of the City's priority projects including the completion of the Exposition Light Rail project, the initial stages of the Subway to the Sea, and preliminary planning for the I-10 Robertson/National ramp realignment are being considered as part of the baseline Regional Transportation Plan (RTP) projects. These projects are important solutions for relieving some of the traffic congestion on the Westside of Los Angeles County. The City is also pleased to note that all of the City's RTIP projects have been included in the baseline RTP projects as well. We would like to note a few minor corrections that we would like to be seen made to the report.</p> <p>- The Exposition Light Rail project from downtown Los Angeles to Santa Monica is discussed in the RTP. The Phase II alignment in the regional map of Rail Transit Projects (Exhibit 3.6) draws the light rail line through Venice Blvd. and Sepulveda Blvd. While Culver City supports Phase I and II of the Exposition Light Rail project, we are opposed to this map's alignment and have been in discussion to ensure that the alignment of Phase II of the project is along the current railroad right of way. Building a light rail line along the currently mapped route would significantly negatively impact traffic along the currently congested Venice Blvd. and Sepulveda Blvd. - On Page 105 where there is a summary of the Exposition Corridor Light Rail Line Phase I and II, the point to point destination for Phase I and II should read respectively: (Downtown LA to Culver City - Washington/National) and (Culver City - Washington/National to Santa Monica) - Metro Rapid Bus expansion (to 28 lines) are discussed with the map indicating Bus Rapid Transit (BRT) lines along Sepulveda Blvd., Lincoln Blvd., Wilshire Blvd., and Santa Monica Blvd. on Page 105 of the RTP. However, Culver CityBus, along with Santa Monica Big Blue Bus, and Torrance Transit, will be operating 4 of the 28 Bus Rapid Transit lines. SCAG should correct statement, because Metro does not plan to operate all of the BRTs in LA County.</p> <p>2 of 3: One suggestion that Culver City has for a future RTP study would be to perform a major surface arterial Peak Speed analysis, similar to the Freeway Peak Speeds analysis (with maps and discussion). Major surface arterials such as Washington Boulevard, Venice Boulevard, Sepulveda Boulevard, Wilshire Boulevard, Santa Monica Boulevard, San Fernando and San Gabriel Valley major arterials, etc., are subject to slow speeds and congestion as would be experienced on freeways during the same peak hours. A plausible reason for the congestion is that drivers decide to exit freeways in search of more efficient routes. As more drivers engage in this tactic major arterials become clogged and drivers then search out "short cuts" through residential streets impacting those neighborhoods. For Los Angeles County, this is a crucial traffic congestion issue that should be reviewed.</p> <p>3 of 3: In regards to SCAG's RTP proposal to decentralize the airport passengers and cargo from LAX by creating better airport ground access, we would also like to comment that moving passengers and cargo from LAX to other airports will</p>	<p>1 of 3 Comments noted. The RTP recognizes that the local planning process for Expo Phase II is continuing, and the RTP will be updated at a future date to reflect the selection of a locally preferred alignment. The description of point-to-point destinations for Phases I and II will be updated in the final RTP. The Metro Rapid Bus expansion is listed as an RTIP project and as currently programmed in the RTIP, LA County Metro is the lead agency.</p> <p>2 of 3 Comment noted.</p> <p>3 of 3 Increased congestion in Culver City from decentralizing passenger demand from LAX to other airports such as Ontario is not expected, since demand in the West Los Angeles/Culver City area is forecast to still be served by LAX in 2035 due to its close proximity.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					also create more traffic congestion through the City of Culver City unless the High Speed Rail Projects are in place and are reasonably priced. Otherwise, we would prefer that passengers and cargo traveling through the SCAG region would remain at LAX for their connecting flights so as to not create additional traffic congestion through our city.	
08-031	2/14/08	Nevarez, Kori	Cypress, City of	Letter	As recommended by SCAG staff, we are providing the following table detailing the affected census tracts and the reasons for our recommendations to have SCAG adjust the 2035 Policy growth forecast numbers for the City of Cypress to be more consistent with the 2006 OCP for 2035. [see attachment]	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Cypress is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.
08-032	2/15/08	Nevarez, Kori	Cypress, City of	Letter	<p>1 of 6: It is our understanding that SCAG Policy Growth Forecast for the 2008 RTP would incorporate the 2008 Compass Blueprint Program. As previously described by SCAG, the Compass Blueprint Program focuses growth on key opportunity areas that would target the growth within two percent of the SCAG Region. Specifically, the Compass Blueprint Program redistributes projected jobs and housing into major transit centers and employment centers, as well as shifting planned growth out of areas with long commute times. When the City of Cypress participated in the review of the Compass Blueprint Program and the associated land use maps, we were told that the Program would be voluntary. We are concerned that the incorporation of the Program's growth projections into a regulatory document like the RTP would change its nature from voluntary to required - especially in light of the RTP consistency finding that is required to qualify for transportation funding.</p> <p>2 of 6: As previously mentioned in our feedbag to SCAG at the Compass Blueprint Program map workshops, Cypress recommends the use of the 2006 Orange County Projections (OCP) as the most accurate growth forecast. The OCP incorporates extensive research and comments from the Orange County jurisdictions with regard to the land use designations and planned growth areas set forth in the adopted General Plans and Development Agreements, including the 2001 Cypress General Plan. Therefore, the City of Cypress recommends that the growth projections from the 2006 OCP be used for the</p>	<p>1,2,3 of 6 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Cypress is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>4,5,6 of 6 Comments on the RTP PEIR. See the Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter number 43.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>purposes of transportation and air quality conformity in the RTP instead of SCAG's Compass Blueprint Program projections.</p> <p>3 of 6: If SCAG does not use the 2006 OCP for the RTP growth projections, then the City recommends that the Compass Blueprint Program projections for the City of Cypress be revised to reflect the detailed revisions requested in the City's letter to Frank Wen at SCAG (dated February 14, 2008, under separate cover). The requested changes would correct inconsistencies between the SCAG growth forecast assumptions and the City's adopted zoning and land use patterns.</p> <p>4 of 6 It appears that many of the mitigation measures from SCAG's RCP that address growth impacts have been incorporated into the draft RTP Program EIR. Since the draft RCP has not gone through a complete public review, these measures may not be appropriate.</p> <p>5 of 6: If some of the growth related mitigation measures for the RTP are necessary to address State requirements regarding greenhouse gases, we recommend that the measures contain the term "should" (recommended) rather than "shall" (required).</p> <p>6 of 6: Many of the RTP EIR Mitigation measure (i.e. solid waste) list requirements that would not apply to projects conducted by regional transportation agencies, such as OCTA. For example, OCTA has no influence regarding the siting of new landfills, the building of local markets for waste reduction, or the development of waste reduction facilities (MM-PS.8-14). In these cases we recommend that SCAG staff consider whether the listed impact is appropriate or correctly worded for transportation projects. Accordingly, such measures should be deleted or revised to designate an appropriate responsible agency for the measure.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-033	1/30/08	Liu, David	Diamond Bar, City of	Public Hearing	<p>My name is David Liu, the Director of Public Works for the City of Diamond Bar, the City of Diamond Bar is very concerned with the proposed RTP which gives the impression that trucks will be concentrated on the SR-60, producing a considerable impact on our city as well as those cities and communities situated along the SR-60 Corridor. In terms of the traffic congestion, the City of Diamond Bar is committed to finding real solutions to the 57/60 traffic congestion which will benefit both local and regional citizens. SCAG's Draft RTP does not appear to be consistent with this goal. Residents of Diamond Bar and the region as a whole have been living with traffic congestion at the 57/60 interchange for far too long. In addition, the City of Diamond Bar appears to (indiscernible) impact on the commuters avoiding freeway congestion; they use up our city streets. The environmental studies for the implementation of four truck lanes, two in each direction on the I-710 freeway for a portion of the SR-60 has been dropped. Given the proposed termination of the project of the SR-60, we must conclude that SR-60 will be heavily impacted. In terms of the environmental impact, the City of Diamond Bar believes any plans that require truck traffic on the SR-60 will only increase health and safety issues. The 57/60 Interchange is already heavily impacted, so adding significant truck traffic in this area is expected to have air quality, noise, and safety impacts, as well as added traffic impacts. In terms of the alternative routes, modes, and technologies, the RTP suggests that there are alternative routes, modes, and technologies that will be looked at, but the technical reports seem to encourage truck lanes on the SR-60. For instance, on page 23 of the Goods Movement Report which contains the heading "Dedicated Lanes for Clean Technology Trucks," the RTP states, quote, "The specific corridor under consideration for such enhancements are the I-710, SR-60, and the I-15 corridors." Another example that's contained in the MAGLEV Multi-county Action Plan which identified the SR-60 as a preferred truck route option. However, this assumption was found to be an unproven conclusion without proper technical support. The City of Diamond Bar is submitting comments expressing our concern with this report. In terms of the funding, according to the MAGLEV 2008 Draft Long-range Transportation Plan, approximately \$475 million has been programmed by Metro for improvements at the 57/60 interchange. However, this contract of \$1.2 billion identified in the SR-60 interchange improvements in the financially constrained RTP projects list, if added monies are intended to be available, it will be the available scenario. If however, a different project revision is in the RTP, like the truck lanes, then we have major concerns. We need clarification of the 57/60 improvements revisions that are included in the RTP. We are very concerned that the revision of truck lanes in the SR-60 will serve to exclude improvements that would serve the general (indiscernible) public. In terms of finding the equitable solutions, the City of Diamond Bar has always understood and supported the involvement of goods movement across Southern California and a country as a whole. However, we have two primary concerns within the system of the SR-60. Number 1, we have not seen any credible analysis to show that SR-60 is the best route based upon utility and compatibility. Number 2, given that the</p>	<p>The SR-60 Truck Lane project is a potential East-West corridor requiring further study as identified in the Strategic Plan of the 2008 RTP. SCAG recognizes that more work and consensus building needs to be done before identifying a specific East-West corridor. In the coming months, SCAG will initiate a Phase 2 of the Multi-County Goods Movement Action Plan work to comprehensively look at the regional goods movement system in more depth.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>SR-60 is the best route, it should not be the only route. There must be a genuine effort to consider all possible routes to serve the ever increasing demands of the east-west movement between the 710 and the 15. It is unreasonable to designate an SR-60 as a singular east-west route funding the 710 routes as SR-60 appears to be the I-10, 91, and 210 as possible routes to share the truck burden. The City of Diamond Bar has been participating in the metro 57/60 improvement east-west study in the City of Burbank as a consultant. This study considers improvements for all traffic, not just truck lanes. Our city is concerned that RTP in that respect to potential solutions or expected outcome of these studies. In conclusion, we need to make certain that 57/60 needed improvements included in the Diamond Bar RTP place mobility of people at the highest priority. We respectfully request an update of the RTP and the RTP Draft Program EIR to assure that all possible improvement and options that may emerge from the 57/60 feasibility to be considered so that the best considered options may be implemented without delays. Attempts to focus truck travel on SR-60 - this type of proposal has been previously pursued. The City of Diamond Bar has put that matter and other cities and communities along the SR-60 are sure to be concerned about being put in another adversarial position. Based on past actions by our constituents have been strongly opposed to proposals that require SR-60 shoulder the burden of east-west truck movements and have been willing to go the distance in their efforts against such proposals. With that, that concludes our public comments and we thank you for the opportunity.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-034	2/19/08	Destefano, James	Diamond Bar, City of	Letter	<p>1 of 10: Mitigation of Existing and Future Mixed Flow Traffic Congestion at the SR-57/60 Interchange Needs to be Included. Mitigation of existing and future mixed flow traffic congestion at the SR-57/60 interchange is of critical importance to the City of Diamond Bar. The City has been actively participating in various improvement efforts that affect this area; including but not limited to the Los Angeles County Metropolitan Transportation Authority ("Metro") feasibility study of potential large scale improvements for the SR-57/60, modification of the Grand Avenue interchange at SR-57/60 being proposed by the City of Industry, development of the planned Lemon Avenue interchange at SR-60, and participation in the completion of the high occupancy vehicle ("HOV") facilities for SR-60 that serve a portion of the SR-57/60 interchange. In particular we did not find reference to potential, future SR-57/60 large scale improvements that are expected to result from the current Metro studies. We did note that approximately \$1.2 billion is included for SR-57/SR-60 Interchange Improvements by year 2023, but this does not concur with current understandings provided by Metro. While we welcome inclusion of this dollar value, we want to insure that the funding can be used for the Metro study's large scale improvements and not necessarily dedicated truck lanes. It is the City of Diamond Bar's expectation that mixed flow traffic improvements will be implemented for this freeway confluence area (which is also critical to the region as a whole). These improvements may include added benefits such as (but would not be limited to) construction of missing freeway connectors, development of added high occupancy vehicle ("HOV") facilities, provision of goods movement improvements, etc. We request that the SCAG RTP and other associated plans recognize Metro's current work and the future SR-57/60 mixed flow improvements that are expected to result from this and subsequent analyses, so these mixed flow improvements may be programmed for implementation without delays.</p> <p>2 of 10: Opposition to Proposals that Serve to Concentrate Goods Movement along the SR-60 Freeway (e.g. between the I-710 and I-15 Freeways). The City of Diamond Bar fully supports projects that will provide improved goods movements throughout the SCAG region. The potential goods movement improvements, however; must result in a balanced approach using many routes and must not place undue emphasis on one path. For example, the draft RTP in the Goods Movement Report (page 23) when addressing "Dedicated Lanes for Clean Technology Trucks", identifies the "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors". The SCAG RTP and associated documents need to be modified to allow full consideration of all potential routes and alternatives for accommodating truck lanes and/or goods movement. We believe this is also a primary request of the SGVCOG as well. At the SCAG public hearing meetings, the City of Diamond Bar's expressed concerns included potential for truck lanes on SR-60. SCAG response at the meetings indicated that the truck lanes will be available for use by only clean, new technology vehicles. Does the RTP</p>	<p>1 of 10 Comment noted. The SR-57/SR-60 interchange improvement is included in the 2008 RTP and reflects input from LA County Metro.</p> <p>2 of 10 The SR-60 Truck Lane project is a potential East-West corridor requiring further study as identified in the Strategic Plan of the 2008 RTP. SCAG recognizes that more work and consensus building needs to be done before identifying a specific East-West corridor. Modeling performed in the Multi-County Goods Movement Action Plan was completed at a macro level and results provided preliminary information that require further study. SCAG will soon begin study to comprehensively look at the regional goods movement system in more depth. We anticipate extensive stakeholder participation in this study. Any dedicated truck lane facilities would be available only for trucks using clean technology with low or zero emissions. SCAG is pursuing other alternatives to move goods through the region including rail and a high-speed regional transport (HSRT) system. These are discussed in the 2008 RTP in the Executive Summary, Chapter three and the Goods Movement Supplemental Report.</p> <p>3 of 10 The SR-60 Truck Lane project is a potential East-West corridor requiring further study as identified in the Strategic Plan of the 2008 RTP. SCAG recognizes that more work and consensus building needs to be done before identifying a specific East-West corridor. Modeling performed in the Multi-County Goods Movement Action Plan was completed at a macro level and results provided preliminary information that require further study. SCAG will soon begin study to comprehensively look at the regional goods movement system in more depth. We anticipate extensive stakeholder participation in this study.</p> <p>4 of 10 Comment addressed above. (see 1).</p> <p>5 of 10 Comment addressed above (number 3).</p> <p>6 of 10 The Comment is noted and will be forwarded to the decision makers prior to their final approval of the RTP. The PEIR addresses environmental impacts at the programmatic level pursuant CEQA Section 15168. Subsequent activities will be examined for project specific impacts, such as the SR-57/60 interchange. See also Master Response No. 2, Section III, and response to Comment Letter No. 30, Section II, Final 2008 RTP PEIR.</p> <p>7 of 10 SCAG is evaluating a number of alternatives to move goods through the region including rail and a high-speed rail transport (HSRT)</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>specifically allow use of future truck lanes, from day one and there after, by only new technology, zero emission, "clean" trucks? This is this impression we were left with, based on the response at the public meeting. Other technical documents have also identified the SR-60 as the preferred route for truck lanes and did not appear to limit use to new "clean" trucks. The City of Diamond Bar has already expressed significant concerns with the Metro "Multi-County Goods Movement Action Plan" (see attached letter, dated January 15, 2008) as there are believed to be many unsubstantiated conclusions contained in that report. Overall the City of Diamond Bar support use of the SR-60 to provide its "fair share" of the goods movement burdens, but is strongly opposed to its designation and implementation as a "Primary" goods movement corridor. We are very concerned that RTP "mandated" truck lanes along the SR-60 would actually preclude (e.g., due to right-of-way, constraints, environmental impacts, costs, etc.) some mixed flow improvement options. If there were unlimited funding available and no environmental factors existed, then perhaps potential truck lanes would not impact potential mixed flow solutions; but obviously that is not a reality. Based on the RTP it appears that rail and alternative technologies may also result in viable methods to serve increased goods movement needs (i.e.; rather than construction of dedicated truck lanes, etc.). We believe the RTP needs to highlight the pursuit of these goods movement alternatives, given existing constraints on the highway system and in particular on the SR-60.</p> <p>3 of 10:</p> <p>Concern that Inclusion and/or Absence of SR-57/60 Improvement Projects Will Mandate and/or Preclude Consideration and Ultimate Implementation. We understand that the SCAG RTP and other related documents are the result of significant efforts and are under time constraints in moving toward approvals of final reports. In general, the City of Diamond Bar is very concerned that the current drafts appears to contain text and materials that may serve to "mandate", implementation of truck lanes and/or focus goods movements along "primary" corridors (specifically the SR-60 Freeway), while also excluding the potential for mixed flow improvement projects. We respectfully request modification of the documents to best address our concerns. Given the voluminous amounts of materials we believe that SCAG and the authors of the reports can best implement edits that will address our concerns, while maintaining the integrity of the overall documents. In short we need the RTP to consider the potential for only mixed flow improvements to be implemented on SR-60 and the potential for exclusion of truck lanes on the SR-60. While we understand this cannot be the only consideration, it must be one of the potential scenarios highlighted in the RTP. We mention other related documents, as we understand there will be on-going coordination between SCAG and Metro to assure consistency between their two plans. There is also the "Multi-County Goods Movement Action Plan", as well as other studies that will need to be considered and made consistent with the SCAG RTP and Metro's Long Range Transportation Plan.</p> <p>4 of 10:</p>	<p>system. These are discussed in the 2008 RTP. While the SR-60 corridor is under consideration as a corridor for dedicated lanes for clean technology trucks, the East-West corridor has not been determined. See also response above to 2 of 10.</p> <p>8 of 10</p> <p>Any discrepancies between the Metro LRTP and the 2008 RTP will be addressed in the final RTP as may be appropriate.</p> <p>9 of 10</p> <p>SCAG is aware that Metro is currently conducting the SR-57/60 Interchange Improvement Feasibility Study. While the SR-60 corridor is under consideration as a potential corridor for dedicated lanes for clean technology trucks, the East-West corridor has not been determined.</p> <p>10 of 10</p> <p>See responses to 2 and 9.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>The City of Diamond Bar is committed to finding real solutions to the SR-57/60 traffic congestion, which will benefit local and regional citizens. As it stands, the draft RTP does not appear to be consistent with this goal.</p> <p>Residents of Diamond Bar and the region as a whole have been living with traffic congestion at the SR-57/60 interchange far too long. In addition, the City of Diamond Bar endures substantial impacts from commuters avoiding freeway congestion with the use of our City's streets.</p> <p>5 of 10: The environmental studies for the implementation of four truck lanes (two in each direction) on the I-710 Freeway from the Ports to the SR-60 have begun. Given the proposed termination of the project at the SR-60, we must conclude that SR-60 will be heavily impacted.</p> <p>6 of 10: The City of Diamond Bar believes any plans that will direct truck traffic to SR-60 will only increase health and safety issues. The SR-57/60 interchange is already heavily impacted so adding significant truck traffic to this area is expected to have air quality, noise, and safety impacts, as well as added traffic impacts.</p> <p>7 of 10: The RTP suggests that there are alternative routes, modes and technologies that will be looked at, but the technical reports seem to encourage truck lanes on the SR-60. For instance, on page 23 of the Goods Movement Report which contains the heading "Dedicated Lanes for Clean Technology Trucks", the RTP states, "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors." Another example is contained in the Metro Multi-County Goods Movement Action Plan, which identified the SR-60 as the "preferred" truck route option. However, this assumption was found to be an unproven conclusion without proper technical support. The City of Diamond Bar has submitted comments expressing our concerns with this report.</p> <p>8 of 10: According to the Metro 2008 Draft Long Range Transportation Plan, approximately \$475 million has been programmed by Metro for improvements at the SR-57/60 interchange. However, this contrasts the \$1.2 billion identified for the SR-57/60 Interchange Improvements in the financially constrained RTP projects list. If added monies are intended to be available it would be the ideal scenario, if however, a different project is envisioned in the RTP (like truck lanes) then we have major concerns.</p> <p>9 of 10 We need clarification of the SR-57/60 improvements envisioned and included in the RTP. We are very concerned that provision of truck lanes on the SR-60 will serve to exclude improvements that would serve the general motoring public.</p> <p>10 of 10: The City of Diamond Bar has always understood and supported the development of goods movement across Southern California and the Country as a whole. However, we have two primary concerns regarding the emphasis on SR-60: 1. We have not seen any credible analysis to show that SR-60 is the</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>"best" route based upon utility and community compatibility. 2. Even if SR-60 is the "best" route, it should not be the only route. There must be a genuine effort to consider all possible routes to serve the ever-increasing demands of the east-west goods movement between the I-710 and I-15. It is unreasonable to designate the SR-60 as the singular east-west route. Ending the I-710 truck lanes at SR-60 appears to rule out the I-10, I-91, and I-210 as possible routes to share the truck burden. The City of Diamond Bar has been participating in the Metro's SR-57/60 Improvement Feasibility Study. This study considers improvements for all traffic types rather than just truck lanes. Our City is concerned that the RTP may not respect potential solutions that are expected to come out of this study.</p>	
08-035	1/10/08	Guerra, Mario	Downey, City of	Multiple Signers	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-036	1/23/08	Sanders, Sedalia	El Centro, City of	Public Hearing	I'm a member of El Centro City Council and also a member of IVAG. My question is for those small rural communities that are located in Imperial County, what avenue might they pursue to assure that some of their transportation needs are met? We recognize the funding streams are usually attached to be spent within a certain time frame. When small rural communities like the technical advice because of their stamping levels, also, they may not have the funding stream, would those dollars be able to be banked over multiple years so that they can then be utilized?	SCAG recognizes the need for locally generated transportation funding in Imperial County--specifically to support the many local jurisdictional needs related to arterials/rural roads. SCAG continues to work with the Imperial Valley Association of Governments along with its member jurisdictions to identify potential resources to address some of the commenter's concerns.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-037	2/15/08	Impett, Laurel	El Segundo, City of (via Shute, Mihaly & Weinberger LLP)	Letter	<p>1 of 7:</p> <p>THE PROPOSED 2008 RTP IS VAGUE AND LACKS DETAIL REGARDING THE GROUND ACCESS PROJECTS NEEDED TO PROMOTE SCAG'S DECENTRALIZED AVIATION STRATEGY. A. The 2008 RTP is Entirely Conceptual and Lacks Specific Details Relating to Airport Ground Access Projects. As the RTP clearly acknowledges, in order to accommodate the increase in aviation demand, the region will need to get future air passengers from the urban areas of Los Angeles and Orange counties to available airport capacity in the Inland Empire (i.e., Ontario) and North Los Angeles County (i.e., Palmdale). 2008 RTP at 69. The challenge of meeting future aviation demand, let alone achieving a decentralized aviation strategy, is complicated by the fact that the regional roadway system is expected to become increasingly unreliable, with daily delay on the system expected to more than double. 2008 RTP Aviation and Airport Ground Access Report at 3. Unless ground access to the region's airports is substantially improved, many potential air travelers will choose not to fly at all, which will translate to substantial economic loss to the region. 2008 RTP at 70. SCAG's 2004 RTP estimated that a constrained 2030 regional airport system even with conservative assumptions about future airport ground access improvements translates to a loss of \$18 billion and 131,000 jobs to the economy of Southern California. Id. at 3 (citing the 2004 RTP). Based on these planning studies and statistics, two facts become extraordinarily clear: (1) the region will not be able to accommodate the region's projected air demand unless aviation activity is decentralized and, (2) airport ground access is the single greatest obstacle to achieving a decentralized airport system. The 2008 RTP, like its predecessor the 2004 RTP, suggests the need for substantial airport ground access improvements throughout the region, in both the short and long term. 2008 RTP at 110. To this end, the 2008 RTP states that its airport ground access strategy will help establish a pattern of decentralization, by attracting a critical mass of passengers and airline service at emerging airports. 2008 RTP at 18. The RTP goes on to state that short-term projects such as arterial, intersection and interchange improvements, and increasing transit access to airports would relieve immediate bottlenecks around airports. 2008 RTP Aviation and Airport Ground Access Report at 3. The RTP further explains that, over the long term, the region will need a system of high speed rail to the suburban airports (typically referred to as High Speed Regional Transport). Id. at 4. Given the extraordinary importance that airport ground access will play in meeting the region's aviation demand, one would expect the 2008 RTP to have described its airport ground access strategy in detail. Unfortunately, the RTP is vague, conceptual and lacks detailed information. Thus, for example, while the RTP states that many of the short term ground access improvements were programmed in the 2004 RTP and are being updated for the 2008 RTP (Id. at 3), we can find no list of projects nor any indication that the 2008 RTP has been updated to include projects from the 2004 RTP. The 2004 RTP contained a sophisticated analytical study which assessed the vast spectrum of physical airport and behavioral air passenger attributes that affect ground access in an</p>	<p>1 of 7</p> <p>Comments noted. SCAG's adopted Regional Aviation Decentralization Strategy, included in the 2008 Regional Transportation Plan and the RTP Aviation and Airport Ground Access Supplemental Report call for making substantial airport ground access improvements throughout the region, including an emphasis on increasing transit access to airports. Many of these improvements are included in the RTP and have been updated with strong local input from airport, city and county transportation planners. Additionally, a High-Speed Regional Transportation (HSRT) system is included in the 2008 RTP, and would create a direct and reliable link capable of connecting airports and urban centers. (See Chapter 3 of the RTP, and High-Speed Regional Transport System RTP Supplemental Report. SCAG has completed an updated list of airport ground access projects for the 2008 RTP, including arterial, intersection and interchange projects for each airport. The list has been updated since the 2004 RTP with the identification of those projects that have been completed as well as projects that are no longer needed since forecasts were reduced (such as at March Inland Port). The project list is very similar to the list included in the 2004 RTP Airport Ground Access Element since the 2035 forecasts for most airports are very similar if not identical to their 2030 forecasts in the 2004 RTP (e.g., LAX is 78 MAP for both RTPs). The entire updated list will be included in the RTP Aviation and Airport Ground Access Supplemental Report. The financially constrained airport ground access projects are contained in the 2008 RTP Project list section. The Final 2008 RTP Airport Ground Access Element will list projects in the 2004 RTP Airport Ground Access Element that have been built. Language in the 2008 RTP will be changed to reflect that the RTP "may have" localized ground access impacts at a number of airports. Baseline airport ground access projects in the constrained plan have been evaluated in the Draft 2008 RTP PEIR on a regional system level basis. Localized ground access impacts should be analyzed at project level environmental review. See also Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 41. 7.</p> <p>2 of 7</p> <p>Comments noted. No specific processes or procedures currently exist to give priority in the programming of airport ground access projects through the RTP. In the near future SCAG will initiate work on a Regional Airport Management Action Plan that will evaluate how each county transportation commission plans and programs airport ground access projects, and the extent to which each commission coordinates with their air carrier airports in the identification and programming of needed ground access projects. Improving coordination between the commissions, key transit</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>interactive multi-airport system. See 2004 RTP Update - Airport Ground Access Report at 6. The Airport Ground Access Study prepared for the 2004 RTP took passenger and air cargo forecasts, converted the data into vehicle trips for each airport, added the data to a background traffic forecast using the SCAG regional transportation model, and identified transportation choke points. Id. at 6-13. Ground transportation projects were then identified to provide efficient access to the region's 10 air carrier commercial airports. Id. Projects were divided into Phase 1 projects (funded, and included in the 2004 RTP), and Phase 2 projects (unfunded, to be considered for future RTPs). Id. at 14. A total of \$4.01 billion (in year 2002 dollars) for Phase 1 and Phase 2 projects was identified. Id. at 45. Despite the extensive planning and seemingly comprehensive list of needed projects, it became apparent that relatively little funding was available for airport ground access projects. Indeed, only about 30 percent of the short term projects were proposed to be funded in the 2004 RTP, representing just over \$1 billion. Id. Four years later, we expected the 2008 RTP to pick up where the 2004 RTP left off - both in terms of planning and financing of ground access projects. Unfortunately, it does not. Although the 2008 RTP purports that the region has successfully secured the necessary resources to support transportation investments proposed in past RTP's (RTP at 139), we can find no evidence of this. The 2008 RTP does not discuss, for example, whether those "funded" short term projects identified in the 2004 RTP have now been built. It does not discuss whether the remaining 70 percent of the short term projects identified in the 2004 RTP are now contemplated to be funded.¹ As for the long term projects (i.e., the High Speed Regional Transport system), the RTP explains that this system would rely exclusively on private financing for development, design, construction, operation and maintenance. RTP at 150. We agree that it is unlikely that public financing will be available for High Speed Regional Transport. Yet, as the Eells' Report notes, the likelihood of such a system being privately financed appears highly speculative as well. Moreover, while the draft 2008 RTP states that the Plan would have localized ground access impacts at a number of airports (2008 RTP at 110 and 2008 Aviation and Airport Ground Access Report at 12), we cannot locate this impact analysis in either the RTP, the Draft EIR for the RTP or these documents' appendices. In addition, the 2008 Aviation and Airport Ground Access Report (at 13) states that the Airport Ground Access Element for the 2008 RTP updates the list of arterials, interchange and transit improvements recommended by the 2004 RTP. Again, we can not find this "updated list." Nor is it clear whether the Airport Ground Access Element is a separate document from the Aviation and Airport Ground Access Report. This impact analysis and list of transportation improvements would appear to be critical components of SCAG's decentralized aviation strategy and should certainly be included in the RTP and the RTP EIR. In short, while we understand that RTP's are intended to provide a long term vision for the region's transportation network, we are perplexed - given the fact that SCAG's decentralized aviation strategy appears to be a core component of the RTP - that the Plan lacks any definitive information on short-term ground access</p>	<p>operators and the new Maglev Joint Powers authority on airport ground access issues will also be a focus area.</p> <p>3 of 7 SCAG has completed an updated list of ground access projects for the 2008 RTP, including arterial, intersection and interchange projects for each airport. The list has been updated since the 2004 RTP with the identification of those projects that have been completed as well as projects that are no longer needed since forecasts were reduced (such as at March Inland Port). The project list is very similar to the list included in the 2004 RTP Airport Ground Access Element since the 2035 forecasts for most airports are very similar if not identical to their 2030 forecasts in the 2004 RTP (e.g., LAX is 78 MAP for both RTPs). The entire updated list will be included in the Final 2008 RTP Aviation and Airport Ground Access Supplemental Report. The financially constrained airport ground access projects are contained in the Final 2008 RTP Project List Supplemental Report. In the near future SCAG will initiate work on a Regional Airport Management Action Plan that will evaluate and identify new strategies for programming and funding high-priority airport ground access projects that are currently unfunded, including projects in the Strategic Plan. SCAG will also continue to work with the commissions to identify new sources of funding for including high-priority ground access projects in the Constrained Plan for the 2012 RTP.</p> <p>4 of 7 See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 41.</p> <p>5 of 7 See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 41.</p> <p>6 of 7 Comment noted. These issues will be addressed by ongoing and future SCAG studies and plans, including the Regional HOV/Flyaway Study (ongoing) and the Regional Airport Management Action Plan (to be initiated in the near future). 3. Current federal aviation law restricts the use of aviation revenues for off-airport ground access projects, and also restricts the use of peak-hour pricing at airports. The objective of providing more flexibility for using airport revenues for off-airport ground access projects is addressed in the Aviation Action Steps in the 2008 RTP Chapter 3, as well as SCAG's Legislative Program. LAWA currently subsidizes incipient airline service at Palmdale Airport by providing free parking, terminal rental waivers, revenue guarantees, and free marketing of services.</p> <p>7 of 7 See Final PEIR Addendum Section 5, Responses to Comments on the Draft RTP PEIR, letter 41.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>projects. Thus, given the overly conceptual nature of the short term ground access projects, coupled with the uncertainty associated with construction and operation of High Speed Regional Transport, we are left with very little assurance that the region's decentralized aviation strategy will come to fruition. Perhaps, as discussed below, the gaps in SCAG's planning may stem from its failure to include aviation-based performance standards in the RTP.</p> <p>2 of 7:</p> <p>THE PROPOSED 2008 RTP IS VAGUE AND LACKS DETAIL REGARDING THE GROUND ACCESS PROJECTS NEEDED TO PROMOTE SCAG'S DECENTRALIZED AVIATION STRATEGY. B. The 2008 RTP Lacks Performance Standards Relating to Aviation Strategy. State and federal regulations require that program level performance measures that include objective criteria that reflect the goals and objectives of the RTP be utilized in the development and evaluation of the RTP. 2008 RTP EIR at 3.14-19. While the 2008 RTP contains performance measures (referred to in the Plan as "performance outcomes"), these performance outcomes do not appear to contain objective criteria nor do they address the region's aviation strategy or airport ground access at all.2 Moreover, while the RTP identifies "Aviation Guiding Principles" and "Aviation Action Steps," these principles and action steps - while clearly intended to promote decentralized aviation - are relatively vague and undefined. For example, one of the Action Steps calls for support for giving priority to key airport ground access projects in the programming of transportation projects in the RTP and RTIP. 2008 RTP at 110. If successfully implemented, this Action Step would certainly facilitate decentralized air travel but we can find no evidence in the RTP that airport ground access projects have been given priority in the RTP or the Regional Transportation Improvement Plan ("RTIP"). Nor can we find any indication as to which criteria SCAG might use to rank the merits of an airport ground access project against a non-airport access project in its transportation programming process. Therefore, without specific airport ground access performance measures, it is not possible to determine the level of commitment to achieving the region's aviation strategy, to monitor the success of ground transportation projects in facilitating the region's decentralized aviation strategy or, given the region's limited financial resources, determine where aviation ground access ranks in comparison to the region's other pressing transportation demands.</p> <p>3 of 7:</p> <p>THE PROPOSED 2008 RTP IS VAGUE AND LACKS DETAIL REGARDING THE GROUND ACCESS PROJECTS NEEDED TO PROMOTE SCAG'S DECENTRALIZED AVIATION STRATEGY. C. Additional Information Regarding Airport Ground Access is Needed if the Region is to Succeed in Decentralizing Air Travel. The 2008 RTP should be revised to include far more specificity regarding the ground access strategy needed to facilitate a decentralized aviation system. As the Eells' Report acknowledges: More details are needed regarding the purpose and need for the recommended projects, anticipated completion dates, and projected benefits for airport access and local traffic circulation. An analysis of the effectiveness of the recommended improvements should be conducted to identify areas which may need additional traffic mitigation or</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>improved airport access. Strategies should be developed to secure the additional funding which will be needed to complete the projects in the Strategic Plan necessary to fully implement the Aviation Decentralization Strategy.</p> <p>4 of 7:</p> <p>THE 2008 RTP DEIR IS INADEQUATE AND FAILS TO ANALYZE WHETHER SCAG'S DECENTRALIZED AVIATION STRATEGY WILL BE ACCOMPLISHED. Given the lack of detail in the RTP, it is not surprising that the DEIR prepared for the 2008 RTP is deficient and fails to comply with CEQA. The RTP DEIR identifies the purpose of the 2008 RTP as providing a clear, long term vision of the transportation goals, policies, objectives and strategies for the SCAG region. DEIR at 2-3. The RTP clearly considers aviation as part of the region's transportation system and specifically includes aviation decentralization as a key strategy of the RTP. DEIR at 2-17. As a result, the DEIR should have comprehensively described the aviation strategy and analyzed whether implementation of the 2008 RTP would accomplish, or begin to accomplish, greater regionalization of air travel. Unfortunately, it does neither. A. The DEIR Fails to Adequately Describe the Aviation Strategy Component of the 2008 RTP. The definition of a project's purpose and objectives lays the foundation for the entire EIR. Analyzing and disclosing a project's impacts is essentially meaningless unless it is done with a view to understanding how well the project achieves its objectives, and whether that achievement is worth the environmental and other costs. Perhaps most importantly, as discussed below, an EIR cannot provide a meaningful comparison between the project and various alternative courses of action unless the EIR analyzes the ability of the project to achieve its own objectives. Here, the RTP DEIR fails entirely because it never clearly defines and describes the aviation strategy, including details of the specific ground access projects that would be needed to take pressure off the region's most constrained airports. Thus, the DEIR should have described the key components of SCAG's aviation strategy, including but not limited to the specific ground access improvements, the funding for each of these improvements, likelihood that each of these improvements would actually be implemented and, finally, a schedule for the implementation of these improvements. We need look no further than the FlyAway program to exemplify the failure of the DEIR to describe key components of the airport ground access system. The 2008 RTP (at 17, 18) states that SCAG is working closely with LAWA on planning and programming a regional system of FlyAways. "The locations of the proposed new FlyAways can be optimized by taking advantage of the region's developing high-occupancy vehicle (HOV) and light and heavy rail networks that can provide direct linkages to Ontario and Palmdale as well as LAX." Id. We concur that this FlyAway system is a very important component of the aviation decentralization strategy. It has the potential for expeditiously facilitating the use of underutilized suburban airports with relatively nominal capital or operational outlay. While the DEIR (and, of course the RTP itself) should have provided an extensive description of SCAG's and LAWA's planning and programming efforts on the FlyAway system,</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>it provides no information other than the brief overview cited above. We expect that SCAG and/or LAWA have ample studies on this important program; this information should have been included in the RTP and DEIR. Because the DEIR lacks critical information on airport ground access projects, the document provides no evidence that implementation of the 2008 RTP would contribute toward decentralized aviation. In keeping with CEQA's central purpose, it is paramount that the EIR provide a sufficient level of information so that the public and decision makers are able to determine exactly what effect, if any, this Plan would have on the region's ability to accomplish a regional airport strategy.</p> <p>5 of 7:</p> <p>4. THE 2008 RTP DEIR IS INADEQUATE AND FAILS TO ANALYZE WHETHER SCAG'S DECENTRALIZED AVIATION STRATEGY WILL BE ACCOMPLISHED.</p> <p>B. The DEIR Fails to Adequately Analyze the Surface Transportation Impacts Associated With the Region's Airports. CEQA requires that an EIR be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. The document should provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decision-makers to make intelligent judgments. Id. Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado, 131 Cal.App.3d 350, 357 (1982) (finding an EIR for a general plan amendment inadequate where the document did not make clear the effect on the physical environment). As discussed above, the 2008 RTP states that the Plan would have localized ground access impacts at a number of airports. 2008 RTP at 110 and 2008 Aviation and Airport Ground Access Report at 12. This analysis of impacts does not seem to have been included in the RTP or the DEIR. If such an impact analysis exists, it must be presented in the EIR itself. See Santa Clarita Organization for Planning the Environment v. County of L.A. ("SCOPE") (2003) 106 Cal. App. 4th 715, 722 (agency's analysis must be contained in the EIR, not "scattered here and there in EIR appendices"). Because the DEIR contains no analysis relating to airport ground access, it is unclear exactly how or why SCAG determined that the Plan would have localized ground access impacts near airports. Inasmuch as the 2008 RTP assumes the implementation of High Speed Regional Transport in its aviation decentralization strategy, it seems counterintuitive that there would be increased ground access (i.e., arterial or freeway) impacts. Moreover, while the DEIR concedes it does not analyze "strategic projects" such as certain segments of High Speed Regional Transport because their funding and therefore implementation is considered speculative (at 2-4), we can find no logical explanation as to why the DEIR omitted any analysis of the short-term ground access improvements since these projects are far less expensive, are relatively short-term, and thus far more likely to be implemented. Again, to comply with CEQA's disclosure requirements, the DEIR must be revised in a manner that actually analyzes the effects of the airport ground access strategy. In conducting this analysis, SCAG should rely on</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>the Aviation Policies, Principles and Action Steps identified in the 2008 RTP itself (See 2008 RTP at 109). Specifically, if SCAG has used these policies, principles and action steps to formulate certain of its CEQA thresholds of significance, it would then be capable of analyzing how the 2008 RTP accomplishes its goal of decentralized air travel.</p> <p>6 of 7:</p> <p>4. THE 2008 RTP DEIR IS INADEQUATE AND FAILS TO ANALYZE WHETHER SCAG'S DECENTRALIZED AVIATION STRATEGY WILL BE ACCOMPLISHED.</p> <p>C. The RTP and DEIR Should be Revised to Seek Additional Approaches to Facilitating SCAG's Aviation Decentralization Strategy. El Segundo clearly understands that full decentralization of air travel is only feasible with a system of high speed transport because it would relieve freeway congestion in urbanized areas and make less congested airports more accessible to air travelers. However, the cost of such systems coupled with the unavailability of any public financing, make its implementation within the 2008 RTP planning horizon (2035) entirely uncertain. Because the RTP's current airport ground access strategy appears to be insufficient to accomplish the goal of aviation decentralization, SCAG must identify other feasible approaches to regionalizing air traffic. For example, SCAG must redouble its efforts to expeditiously implement short-term ground access projects such as an expanded FlyAway system to serve emerging suburban airports. In addition, SCAG should evaluate the potential for bus rapid transit to serve underutilized airports and investigate potential light rail, heavy rail and commuter rail extensions to the major airports in the region. The revised RTP and EIR should also provide more information regarding the role that LAWA and airlines can play in the region's aviation strategy. In addition to being willing to invest in new flights at emerging airports, LAWA could participate in funding High Speed Regional Transport and other ground access projects with an increase in airport passenger facility charges. Moreover, SCAG should work closely with LAWA and airlines to evaluate aviation demand management measures such as peak hour pricing (i.e., passengers pay much higher fees to travel during peak ground transportation peak hours) or scheduling more flights during off-peak hours. Finally, LAWA and airlines could charge less per ticket for passengers traveling at underutilized airports.</p> <p>7 of 7 Is a PEIR comment, to be addressed by PEIR staff.</p>	
08-038	2/19/08	Fitts, Michael	Endangered Habitats League	Letter	<p>As SCAG staff well knows, federal law requires that the fiscally constrained portion of the 2008 RTP be supported by a demonstration that the funding for the projects in the plan, when taken as a whole, is "reasonably available." The 2008 RTP does not measure up to those standards. Specifically, DOT regulations require that Regional Transportation Plans be supported by "[a] financial plan that demonstrates how the adopted transportation plan can be implemented." (23 C.F.R § 450.322(a)(10).) Further, "[i]n the case of new funding sources, strategies for ensuring their availability shall be identified." (23 C.F.R 450.322(a)(10)(iii), emphasis added.) The fiscal constraint requirement is intended to ensure that metropolitan long-range transportation plans, TIPs, and STIPs reflect realistic assumptions about future</p>	<p>SCAG found that the 2008 RTP meets the fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement referenced by commenter that strategies for ensuring availability of new funding sources shall be identified. See 23 CFR 450.322(f)(1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The documentation referenced with respect to the tolling analyses provides sufficient foundation for the assumptions in the 2008 RTP. Traffic forecast assumptions serve as the basis for the</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>revenues, rather than being lists that include many more projects than could realistically be completed with available revenues. Accordingly, EPA's transportation conformity regulations specify that an air quality conformity determination can only be made on a fiscally constrained long-range transportation plan. (See 40 CFR § 93.108.) The 2008 RTP relies on several new sources of funding, including approximately \$ 26.0 billion from the imposition of tolls to finance the construction and operation of several new mixed-flow lane highways in new alignments throughout the SCAG region: "Within the time horizon of the 2008 RTP, additional toll road facilities are expected to be implemented, including the I-710 Tunnel Gap Closure (I-710/Valley Blvd to California Blvd/Pasadena Ave), the I-710 South Corridor (dedicated lanes for clean technology trucks from the Ports to the SR-60 Interchange), the High Desert Corridor (I-5 to US-395), and the CETAP Riverside County to Orange County Corridor." Appendix B of the 2008 RTP, at Table 3.3, further states: "Highway Tolls Description: Toll revenues generated from I-710 tunnel. Also, tolls assumed for the I-710 dedicated truck lanes, High Desert Corridor, and CETAP Corridor Assumptions: Toll revenues based on recent feasibility studies for applicable corridors. Also includes toll revenue bond proceeds. \$26.0 Billion" Recognizing that simply assuming that these corridors can credibly be financed purely through the imposition of tolls is insufficient to meet the fiscal constraint requirement, the 2008 states: "The financing of toll road facilities has become sophisticated in recent years, with increasing levels of participation by the private sector. SCAG is fully aware of the need to carefully consider the economics of specific projects as there is not a "one size fits all" solution. Various toll road financing models are being evaluated including public and private concessions, shadows [sic] tolls, and direct user paid tolls. For purposes of developing the 2008 RTP financial plan, projections of traffic and revenue generation potential were based on a review of toll feasibility studies and consideration of comparable facilities. Revenue potential from tolling new facilities depends on several factors including length of lanes, configuration of the facilities, and tolling policy. Documentation on reference sources utilized to analyze toll revenue potential is included in Appendix B. Additional financial feasibility work for specific facilities is included in this Appendix F." (Appendix F, Emphasis added.) As noted above, the reader is referred to "documentation on reference sources utilized to analyze toll revenue potential" on these corridors that is "included in Appendix B." But a review of Appendix B reveals no studies or reference sources showing that sufficient toll revenue is "reasonably available." It simply states that "[t]oll revenues [are] based on recent feasibility studies." But where are these feasibility studies and what to they show? While Appendix B does refer to and rely on traffic forecasts for the various new corridors assumed to be financed with tolls, there is no evidence that the demand for these facilities as toll roads was ever assessed. Nor is there any evidence showing that sufficient numbers of drivers would be willing to pay a toll high enough to generate the assumed \$ 26 billion plus interest in revenue necessary to construct these facilities. Studies relating to the performance of the Orange County tollroads and to the</p>	<p>toll revenue projections. Further, these documents were provided to the commenter as requested.</p> <p>As for legislative vehicles for implementing toll strategies, SCAG continues to work with its stakeholders to pursue enabling legislation as needed for specific facilities. SCAG anticipates showing considerable progress to implementation over the next few years.</p> <p>See also Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 20.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>State Route 91 median toll lanes, cited by the 2008 RTP, also do not demonstrate the potential feasibility of entirely different alignments in different regions of Southern California and on projects (such as tunnels) with entirely distinct cost characteristics. SCAG itself admits that it “is fully aware of the need to carefully consider the economics of specific projects as there is not a “one size fits all” solution.” (Appendix F, Emphasis added.) At best, these Orange County studies show that toll roads in these other locations have worked, but even there the record is mixed. Despite confident projections to the contrary, for example, the San Joaquin Hills Toll Road in high income coastal Orange County has been a colossal financial failure, relying on a series of loans and refinancing to stay alive. There is yet another reason why tolls for general purpose “mixed flow” lanes on these facilities cannot be determined to be “reasonably available”—there is no legislation permitting it. Indeed, the only legislation cited by the 2008 RTP in support of its financial plan specifically excludes such lanes from tolls. Assembly Bill 1467 states that the tolls it authorizes shall finance projects “primarily designed to improve goods movement, including, but not limited to, exclusive truck lanes and rail access and operational improvements.” (Legislative Counsel’s Digest.) Section 143(e)(4) of the Street and Highways Code now specifically states that “[t]olls and user fees may not be charged to noncommercial vehicles with three or fewer axles.” If tolls cannot be levied on passenger cars—i.e., vehicles with three or fewer axles—then how can this legislation support the fiscal constraint demonstration? Finally, the strategic plan submitted for these projects only serves to underscore the work that SCAG failed to require before they could be considered “fiscally constrained.” It shows that there is no legislation even proposed to authorize such tolls; as mentioned, AB 1467 specifically prohibits tolls on passenger vehicles. It also shows that there is no commitment from any private stakeholder, or even a serious expression of interest, and no serious business plan. It shows that there are no marketing studies. It shows that feasibility pre-development work has not even been started. In short, if funding for these facilities is “reasonably available,” then it strains the imagination to consider what isn’t “reasonably available?” Until additional support for the toll strategies is provided, federal mandates require that new general purpose lanes in projects that rely heavily on new sources of toll revenue be removed from the constrained 2008 RTP. Thank you for considering EHL’s views. As always, EHL would be more than happy to discuss our position concerning the 2008 RTP with SCAG staff.</p>	
08-039	2/19/08	Allen, Heather	Fullerton, City of	Letter	<p>The City of Fullerton respectfully requests that the Regional Council maintain the voluntary nature of the policy growth forecast as stated in the RTP document. To do so, the baseline forecast, not the policy growth forecast, must be adopted by the Regional Council as the official growth forecast for the 2008 RTP. In comparing the baseline and policy growth forecasts for the City of Fullerton, growth is focused in two areas, the Downtown and the western City limits with Buena Park. The policy growth in both areas is problematic: Downtown - The policy growth forecast has placed an additional 3,309 dwelling units (3,210 households) in Downtown Fullerton in addition to</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Fullerton is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					baseline, for a total of 3,774 dwelling units (3,662 households). While some units above the baseline are supported by General Plan build out, additional growth should not be assigned to the area without the necessary analysis and public input which are within the purview of the City of Fullerton. Similarly for jobs, the baseline forecast identifies 1,472 new jobs while the policy growth forecast places 7,370 jobs over baseline in the Downtown. Remaining development potential for this area is approximately 235,000 based on the 1996 General Plan. West Fullerton – City and Town Residential developments are proposed at the western City limit with Buena Park to support the development of transit within that City. So long as the Fullerton Municipal Airport is in operation, the land uses and corresponding growth identified in the policy growth forecast are not possible.	
08-040	2/19/08	Raupp, Grant	Garden Grove, City of	Letter	The portion of tract 881.01 in Garden Grove is entirely industrial, and we do not foresee any land use change to residential in the future. Tract 881.07, along Garden Grove Blvd., is likely to see more households than SCAG projects due to possible higher density residential and mix-use projects. Tract 882.01 is a fully built out single-family residential area with some commercial use. Given the average size of lots, it is unlikely there will be room enough to accommodate second units enough to increase more than the OC 2006 Projections. Tract 882.02 is a fully built out single-family residential area with some commercial use. Given the average size of lots, it is unlikely there will be room enough to accommodate second units enough to increase passed the OC 2006 Projections. Tract 884.02 is in a fully built out single-family residential area and includes the city's International West hotel and entertainment district. The tract also includes a school and open space. SCAG's growth in households in the tract is not expected. Tract 885.02 is in a fully built out single-family residential area and includes the city's International West hotel and entertainment district. The tract also includes a school and open space. SCAG's growth in households in the tract is not expected. Tract 886.01 is projected to have more households than SCAG forecasts due to possible residential and mix-use projects in Garden Grove's civic center and Main Street areas. Tract 886.01 is projected to have more households than SCAG forecasts due to possible residential and mix-use projects in Garden Grove's civic center area. Tract 887.01 is projected to have more households than SCAG forecast calls for due to the possible development of the "Brookhurst Triangle" area, which is likely to include a mix of uses including condominiums, as well as residential development along Garden Grove Blvd. Tract 887.02 is projected to have more households than SCAG forecasts due to possible mix-use and residential development along Garden Grove Blvd. and Brookhurst St. Tract 888.01 is projected to have more households than SCAG forecasts due to possible mix-use projects with higher densities along Garden Grove Blvd.	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-041	2/19/08	Powers, Richard R.	Gateway Cities Council of Governmen ts	Letter	<p>1 of 8 The 2008 RTP process has been an open and inclusive process with many opportunities for participation by regional jurisdictions and the public.</p> <p>2 of 8 The I-710 project between the San Pedro Bay Ports (SPBP) and State Route 60 does not appear to be clearly and consistently represented and included in the draft 2008 RTP. Most importantly, it is not always represented in a way that is consistent with the Locally Preferred Strategy adopted by the I-710 Oversight Policy Committee and the Los Angeles County MTA. For example, the project is shown in Table 3.2 and on Exhibit 3.3 as a mixed flow highway project with a completion date of 2020. However, page 117 of the Draft RTP refers to “the first phase of a dedicated, toll clean technology truck lane system,” and page 118 and Exhibit 3.9 clearly describe “the I-710 as the first phase of a comprehensive system.” The Supplemental Goods Movement Report (page 23) also identifies I-710 as a “specific corridor under consideration for” a dedicated clean technology truck lane, but it does not mention the possibility of tolling. SCAG staff has indicated that I-710 was modeled as a tolled truck lane. Yet Table 3.3, HOT Lanes and Toll Facilities, does not list the I-710 as a toll facility project. Since project alternatives are now under evaluation as part of the I-710 EIS/EIR process, SCAG should consider modeling I-710 without as well as with tolls. Similarly, the RTP project description for I-710 should note that there is a current effort to evaluate the feasibility of alternative technologies in the I-710 corridor, but that no decision on the use of that type of technology to move freight has been made as of the date of the RTP. The RTP should also include the I-710 early action projects in the constrained plan (Shoemaker Bridge/Anaheim St and PCH interchanges, Firestone Blvd. interchange and Northbound Atlantic Blvd./Bandini Blvd. ramp/interchange). Los Angeles County RTIP project No. LAE3773 (page 7 of the Project Listing Report) refers to “reconstruct[ing] I-710 interchanges as part [of] I-710 corridor improvement program,” but does not identify which specific projects are programmed or planned for the identified funding of \$7.4 million. There is an I-710 project, titled “freeway corridor improvements,” in the strategic plan, but the lead agency is shown as the City of Los Angeles, which is not the case for the I-710 project. It is unclear why this listing is included.</p> <p>3 of 8 We are concerned that the inclusion of a 9.2-million-TEU High Speed Rail Transport system for cargo in the RTP could adversely affect the evaluation of alternatives, including alternative cargo movement technologies, for the I-710 corridor EIR/EIS, by effectively prejudging the outcome of this critical local planning process. Our concerns are heightened because discussions preceding the City of Los Angeles’ vote to join the new Joint Powers Authority for the Initial Operating Segment referred to a cargo spur to the ports. For example, Table 3.9 and the text on page 121 describe a system that would run from the ports to some inland facility in San Bernardino. The system would carry only freight from the ports north to a junction with the east-west initial operating segment of a combined passenger-freight high-speed system. The port</p>	<p>1 of 1 Comment noted.</p> <p>2 of 8 The LAE3773 and LA0B952 projects were submitted by Los Angeles Metro for the 2006 RTIP and therefore incorporated into the 2008 RTP. For the forthcoming 2008 RTIP, Metro has requested that SCAG combined the 710 project listings into LA0B952. Any changes to RTIP projects must be requested by Metro as part of the RTIP development process.</p> <p>3 of 8 SCAG is embarking on evaluating a regional goods movement system, and any alternative scenarios resulting from the I-710 EIR/EIS will be incorporated into the next RTP as part of the system. As for capacity assumptions, in order to conduct conformity analysis, we need to make certain assumptions including the cargo handling capacity. However, we recognize that these numbers need to be refined and updated as the specifics of the projects are developed.</p> <p>4 of 8 The selection of an Inland Port facility requires extensive technical analysis of many planning issues and factors, such as goods movement market segmentation (O-D patterns), mode, types of commodities, existing freight system, and land availability etc. SCAG will look into these issues using a comprehensive and integrated approach and will develop a Comprehensive Regional Goods Movement Plan and Implementation Strategy within the next three years.</p> <p>5 of 8 The Orangeline Development Authority and SCAG’s Initial Operating Segment (IOS) are different entities and thus have separate business plans. Many of the HSRT segments in the RTP will have intermodal connections.</p> <p>6 of 8 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the local input (as documented in the 2008 RTP Growth Forecast Report), provided by subregions and cities within Los Angeles County. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>7 of 8 Comment noted. SCAG will make any requested corrections/adjustments to the 2008 RTP, as necessary and appropriate. The percentage reflecting the container volume being transported by trucks will be adjusted in the Final 2008 RTP.</p> <p>8 of 8 It is SCAG’s intent to work closely with Transportation Commissions</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>segment is described as running “parallel to the I-710/Alameda Corridor.” It is not clear how SCAG determined that the HSRT will handle 9.2 million TEUs, or how this capacity compares to the actual corridor need. Further, it is unclear whether the alternative technology scenario to be investigated in the I-710 EIR/EIS may (or may not) be part of a regional system. The RTP should be clarified to explain the status of the EIR/EIS and how alternative technology is being evaluated and what role it might play in the ultimate outcome for freight movement in that corridor. The COG is supporting the “idea” of a freight movement corridor that would handle large volumes of freight, but it is very presumptuous to assume a container volume and technology at this time.</p> <p>4 of 8</p> <p>A related point is that it is unclear where in San Bernardino an inland port facility for freight might be developed. Other areas (e.g., North Los Angeles County) are also vying to be a location for an inland port should the concept prove feasible.</p> <p>5 of 8</p> <p>It is also unclear just what plan for high-speed regional transportation is included or recommended in the RTP. Appendix F of the Transportation Finance Supplemental Report includes one report on “HSRT/Alternative Technology Systems for Passenger and Freight” and another on “Orangeline High Speed Maglev.” It is not clear how these two systems or segments might coordinate or relate to each other when built. Also, the former report contains a section at the end on “Environmental Mitigation and Mobility Initiative,” but again it is unclear how this system might relate to the system described in the balance of the document or which system SCAG is envisioning for implementation in the RTP. Supplemental Report No. 9 (“High Speed Regional Transport System”) presents much of the same information as does the similarly titled report in Appendix F, but does not include any mention of the “Environmental Mitigation and Mobility Initiative.” Clarification of how these systems relate (if they do) should be included in the plan.</p> <p>6 of 8</p> <p>SCAG developed a baseline population, housing, and employment growth forecast out to 2035 based on local input from cities and counties. However, SCAG has based the proposed draft 2008 RTP on a policy forecast that differs from the baseline in significant ways at the local (city) level as well as at the subregional and county levels. The policy growth forecast raises some questions about the underlying assumptions. For example, some older, built-out areas where SCAG predicts greatly increased residential density are unlikely to shift from industrial uses even as they may redevelop. Unless SCAG can assure cities that having a planned or actual growth pattern different from that in the 2035 RTP forecast will have no undesirable consequences – for example, a reprioritization of transportation project funds – SCAG should use the cities’ own baseline forecast as the basis for the analysis in the 2008 plan recommended for adoption. This is a major concern for Gateway Cities as the forecast being assumed by SCAG appears likely to result in higher density developments in Gateway Cities for areas that are already densely developed.</p>	<p>and Transit Operators to identify opportunities for improved transit services. SCAG recognizes that a region this size has a variety of varied transit needs, and would seek to assist our stakeholders in identifying options and the resources necessary to meet that varied set of needs. SCAG’s Transportation and Communications committee directed staff in the development of the RTP to look outside the box at how fares and fare policies might be used to increase transit use. SCAG understands that this needs to be coupled with a sustainable revenue stream to pay for the operations of transit. SCAG’s policy recommendation referenced by the commenter, would involve doing both.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>This decision by SCAG could “skew” the regional traffic model (2035 projections) and make those projections unreliable or inaccurate for Gateway Cities. We believe that the baseline forecast should be adopted as the official forecast for the RTP as it reflects local input and is the most likely and therefore the most accurate growth scenario. Goods Movement 7 of 8</p> <p>It appears that several freight rail grade separation projects of concern in the Gateway Cities subregion are omitted from the RTP and should be included in this long-range plan. (These comments assume that the LA County grade separation projects shown in Exhibit 3.11 are listed in numerical order as in the other county exhibits.) The requested projects are identified as follows: Lakeland Road crossing (BNSF) – Santa Fe Springs, Pioneer Boulevard crossing (BNSF) – Santa Fe Springs,</p> <p>o Rosemead Boulevard (UP) – Pico Rivera, Paramount Boulevard (UP) – Pico Rivera, Garfield Avenue (UP) – City of Commerce, Valley View/Stage Road (BNSF) – Santa Fe Springs and La Mirada, On page 67 of the Draft RTP appears a statement that “More than 60 percent of the containers processed by the ports will involve a truck trip within the SCAG region.” The Multi-County Goods Movement Action Plan places this figure at close to 80%. This and other discrepancies between the RTP and the Multi-County Goods Movement Action Plan should be addressed and resolved. Table 2.6, Daily Truck Volumes by Corridor, omits two of the corridors most heavily used by trucks: I-605, and State Route 91. The 2002 and 2025 counts for these freeways should also be included and considered in SCAG’s analyses of regional and subregional goods movement impacts. Gateway’s recent study of the 91 and 605 freeways projects that in 2030, the 91 freeway will carry 41,800 trucks daily and I-605 will carry 38,050 (north of 91). The observation on page 120 that passenger train volumes are expected to experience growth similar to that in freight train volumes seems irrelevant to the freight discussion.</p> <p>8 of 8</p> <p>In the Transit Operations section on page 96, SCAG proposes to work with transit operators to develop service delivery policies to optimize transit service. While we concur that frequent and efficient transit is desirable, there are such variations among transit services in the 6-county area that this has long been under the purview of the County Transportation Commissions, where it should remain. If SCAG wishes to conduct a study, it could provide its findings to the CTC’s for consideration. In the same section, SCAG recommends analysis to recommend fare adjustments to maximize transit use, including fare-free concepts. While additional and stable sources of subsidies for transit operations are needed, it is important to note that Los Angeles’ fares are among the lowest in the nation and many operators are considering increasing their fares as the only way to obtain additional operating revenues due to shortfalls at the state and federal level and possible losses of local sales tax revenues due to the economy. Rather than conduct a fare study, it may be more productive for SCAG to investigate other ways of increasing transit operating funds.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-042	2/14/08	Hawkins, Robert	Golden Rain Foundation /Laguna Woods Village	Letter	<p>Thank you for the opportunity to comment on the captioned documents for the Project. This firm represents the Golden Rain Foundation ("GRF"), a California non-profit corporation, which oversees the management and maintenance of the property, facilities and services within the senior community of Laguna Woods Village, formerly known as "Leisure World" in Laguna Woods, California. GRF manages property, facilities and infrastructure including roads and streets within the Laguna Woods Village and is in the process of perhaps developing additional lands provided for in the Laguna Woods General Plan. On behalf of GRF and its community, we offer the following comments on the RTP and the DPEIR. L. The DPEIR Relies on a Flawed, Vague, and Incomplete Project Description. Chapter 2 of the DPEIR contains the Project description. The DPEIR states that the need for the Project arises from federal and state statutory requirements that the Regional Council must develop a regional transportation plan. The DPEIR states: "The 2008 RTP is a long-range regional transportation plan that provides a blueprint for future transportation improvements based on specific transportation goals, objectives, policies and strategies." DPEIR, 2-2. Table 2-2 identifies the goals of the RTP. These include: maximizing mobility and accessibility for all people and goods in the region; preserving and ensuring a sustainable regional transportation system; and encouraging "land use and growth patterns that complement our transportation investments."</p> <p>The DPEIR develops priorities and policies which balance these goals. For instance, the DPEIR states: "The RTP must also integrate land use policies as a means to influence transportation performance and the economy. Without such integration, transportation needs in the future will significantly outpace the ability to pay for them." DPEIR:2-6. Among the policies for the RTP, the Regional Council adopted: "RTP land-use and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and subregions." DPEIR, 2-6. However, it is unclear how the DPEIR accomplishes this collaborative implementation. The primary method for collaborative implementation is the Regional Council's Compass Blueprint Growth Vision, in addition to legislative efforts, shapes the implementation program for enacting these policies and programs through partnerships with and services offered to cities, counties, subregions and county transportation commissions to ensure these positive effects on air quality." DPEIR, 2-11. This Compass Blueprint program is " ... one of the first large-scale regional growth visioning efforts in the nation...." It seeks: " ... to integrate land use and transportation with the goal of accommodating approximately 5.14. million additional residents between 2008 and 2035, while improving mobility for all residents, fostering livability in all communities, enabling prosperity for all people, and promoting sustainability for future generations." DPEIR,2-11. Unfortunately, as discussed more fully below, this regional land use program conflicts with state law and local land use plans. As indicated above, part of this program may have to include legislative action to allow for a regional transportation plan which seeks to influence local land use plans; under</p>	See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 44.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>current law, the regional plans have no ability to influence local land use plans. Interestingly, relying on legislative changes is speculative: changes to the State Planning Law or other changes depend upon the political process which at best is unpredictable. Moreover, the Regional Council is a joint powers authority formed under the Joint Exercise of Powers Act, Government Code section 6500 et seq. Although as a joint powers agency, the Regional Council may have the authority to exercise powers of its members jointly, nothing in the Act allows the joint powers agency to exercise powers especially land use powers over one of its members which powers are exclusively reserved for that member. Hence, the Regional Council has no land use authority or powers within the jurisdiction of local governments including the City of Laguna Woods or the County of Orange. Moreover, such regional plans should not directly or indirectly influence local land use plans. See Government Code section 65080.3. To the extent that the Regional Council seeks to have such influence, it must be based on regional efforts to educate local government, not by transportation mandates and sanctions. Indeed, the Project for the RTP really appears to be a regional land use planning project. The DPEIR states: "SCAG prepared two growth forecasts in preparation of the 2008 RTP, a 'baseline' growth forecast that does not include land use strategies and a 'policy growth alternative' (used in the Plan). The comparison of the transportation modeling results between the 'baseline growth alternative' and the 'policy growth forecast' isolates the transportation benefits due to regional land use policy." DPEIR, 2-11-12. However, this methodology ignores the local impacts-both land use and transportation- due to this regional policy benefit. Moreover, the benefit is only incremental: technological changes likely will account for greater savings than this controversial regional planning effort. Further, any incremental benefit from regional planning will be drastically lessened by the conflicts between the regional plan and local plans and between regional transportation plans and local transportation plans. Indeed, the regional planning effort may leave crucial local planning policies and transportation needs without the necessary funding. Without this funding, local transportation needs and problems will be exacerbated. More importantly, the Project description is too vague, too ambiguous, and lacks specifics. The RTP is a regional transportation plan but it lacks specifics as to what transportation projects are planned. That is, it contains: "transportation/urban form strategies that encourage compact growth, increased jobs/housing balance, and centers based development where feasible, in all parts of the region." DPEIR, 2-22. This is far from the regional transportation plan required by state and federal law. The RTP and the DPEIR should be revised to explain how the Regional Council has the authority to develop and adopt this regional "urban form strategies" under current law. Further, the RTP and the DPEIR should be revised to assess and consider the impacts of this "transportation/urban form strategy" on local land and transportation needs, decisions and projects. This "transportation/urban form strategies" requirement is troubling for another reason: funding of local transportation projects. "Transportation projects in the SCAG region must be</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>consistent with the RTP in order to receive federal funding. The 2008 RTP includes a policy element with goals, policies, and performance indicators, an action element that identifies projects, programs and implementation. In addition, the RTP includes a description of regional growth trends to help identify future needs for travel and goods movement." DPEIR,2-4. However, given that the RTP may conflict with local land use plans, this may create further economic impacts for the Project which impacts must be analyzed under the National Environmental Policy Act, 42 U.S.C. sections 4321 et seq. Indeed, we understand that part of this transportation/urban form strategies may include reassigning housing units to other areas despite local general plans and their requirements. This conflict must be explained in the RTP and analyzed in the DPEIR. If this impact to local plans is correct, it must be mitigated. As discussed below, the Regional Council has many avenues for such mitigation. II. The DPEIR Relies on a Flawed Methodology and Mistaken Assumptions on Land Use which Lead the DPEIR to Erroneous Conclusions. As you know, the original Notice of Preparation for the DPEIR indicated that the DPEIR would address both the RTP and the Regional Comprehensive Plan. The Regional Council received loads of comments critical of this methodology and urging the Regional Council to separate the projects. The DPEIR indicates that the Regional Council agreed and rescope the Project for the DPEIR to include only the RTP. DPEIR, 1-5. Unfortunately, the DPEIR does not really separate the two projects. The land use assumptions in the RCP based on the Compass Blueprint Program form the basis of most of the analysis in the DPEIR including its land use and transportation analyses. These incorrect assumptions infect the entire environmental analysis in the DPEIR. Indeed, as indicated above, the unnumbered section of the Project Description, Chapter Two, entitled "The Intended Uses of PEIR" (sic) fails to identify that one of the intended uses is for reference to the draft environmental impact report for the RCP. Given that the Regional Council originally intended to treat both in the same document, it is likely that the two documents, if there are two, would reference each other. Obviously, the DPEIR includes the RCP. For instance, Section 3.8 attempts to analyze land use issues for the Project. This section identifies two project-related impacts and one cumulative impact which, after mitigation, remain unavoidable and significant: 1. Impact 3.8-1: "The proposed 2008 RTP contains transportation projects and strategies to distribute the future growth in the region. These projects and strategies could result in inconsistencies with currently applicable adopted local land use plans and policies in the RTP including the potential to conflict with local general plans." (DPEIR,3.8-10) 2. Impact 3.8-2:"The 2008 RTP contains transportation projects that have the potential to disrupt or divide established communities." (DPEIR,3.8-13) 3. Cumulative Impact 3.8-3: "Urbanization in the SCAG region will increase substantially by 2035. The 2008 RTP, by increasing mobility and including landuse- transportation measures, influences the pattern of this urbanization. The 2008 RTP's influence on growth contributes to regional cumulatively considerable impacts to land use and would change the intensity of land use in some areas." (DPEIR 3.8-15). As indicated above, the DPEIR concludes that,</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>after all mitigation measures considered in the DPEIR, these impacts remain significant and unavoidable. As indicated above, the DPEIR fails to consider all necessary and appropriate mitigation measures to lessen the RTP's land use impacts. MM-LU.1 through .7 fail to consider and appreciate fully local land use plans. MM-LU.1 encourages local agencies to provide electronic versions of their general plans and updates. MMLU. 2 provides that the Regional Council shall encourage, through regional comments, local agencies to update their general plans every ten years. MM-LU.3 provides that the Regional Council shall work with local agencies "to ensure that transportation projects and growth are consistent with the RTP and general plans." (It fails to note or appreciate that the RTP may conflict with local general plans.) Interestingly, MM-LUA provides: "Planning is an iterative process and SCAG is a consensus building organization. SCAG shall work with cities and counties to encourage that general plans reflect RTP policies. SCAG will work to build consensus on how to address inconsistencies between general plans and RTP policies."</p> <p>DPEIR, 3.8-11. This mitigation measure fails to understand that one way to eliminate RTP inconsistency is to make the RTP more closely mirror local plans. MM-LU.5 and .6 require that the Regional Council work closely with local agencies so that local general plans will comply with the requirements of the Regional Comprehensive Plan and the Compass Blueprint. That is, the Regional Plan for growth will change the local land use plans. The Regional Council cannot require either directly or indirectly such compliance. More pointedly, the Regional Council cannot use financial means, e.g. failing to fund crucial transportation projects required by local land use plans, as a way of gaining compliance of local plans with the Regional Plan. Clearly, other and better mitigation measures are available which will address fully the RTP's land use impacts. For instance, instead of requiring local compliance, the RTP could be revised to include consultation with local agencies and funding of important local transportation plans. Or working with local agencies to include compliance with various aspects of the RTP in exchange for funding local plans for infrastructure which may be out of synch with the RTP. For instance, Laguna Woods Village and the City of Laguna Woods make extensive use of alternative means of transportation, e.g. bike lanes and electric vehicles. The RTP should be revised to value these alternative methods and fund other projects which may not be contemplated by the RTP, e.g. expansion of congested roadways such as Moulton Parkway and/or El Toro Roaa. Further, as indicated above, these conclusions are fatally incorrect for several reasons. First, the Regional Council does not have the authority to override local land use plans and policies including local general plans. Indeed, Government Code section 65080.3(g) provides: "Nothing in this section grants transportation planning agencies any direct or indirect authority over local land use decisions." Although section 65080.3 applies to alternatives, if the alternatives truly are alternatives to the proposed plan, the plan must be bound by the same restrictions: No authority to override, either directly or indirectly, local land use decisions, e.g. general plans. Moreover, the State Planning and Zoning Law provides almost plenary authority to local agencies over local land</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>use matters. For instance, Government Code section 65800 provides, in pertinent part that except for areas not applicable here: "[T]he Legislature declares that in enacting this chapter it is its intention to provide only a minimum of limitation in order that counties and cities may exercise the maximum degree of control over local zoning matters." Second, the only basis for the assumptions in the land use analysis lies in the RCP which is based upon the Compass Blueprint Program. However, the DPEIR states that it does not rely on the RCP. Because the RCP underlies the DPEIR's analysis, the DPEIR is internally inconsistent. It must be revised to explain and clarify its land use assumptions which are not part of the RCP. Third, none of these impacts are unavoidable. If the RTP is consistent with local land use plans, then it would not have these impacts. Further, even if not consistent, if the Regional Council were to assist, cooperate and work with all member local agencies to develop local general plans and the RTP which are consistent in the main, then the Project would avoid these impacts. Fourth, although these impacts of the Project are significant, if the Regional Council worked with local agencies to understand and appreciate local general plans, it could modify the RTP so that it more closely conformed to local general plans. Indeed, even if the RTP did not closely conform with local land use plans, this cooperation would bring the local agencies more perfectly into the process. Fifth, as indicated above, the Project cannot directly or indirectly alter local land use policies and decisions. Because the Project conflicts with local plans, it encroaches illegally into the authority of local agencies. Sixth, the DPEIR uses an improper baseline for the RTP. The DPEIR fails to consider existing facilities and land use, and improperly relies on approved general plans as the baseline. This is improper. The appropriate baseline is the existing condition. As the Court of Appeal recently observed: "Before the impacts of a project can be assessed and mitigation measures considered, an EIR must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined." County of Amador v. El Dorado County Water Agency (1999) 76 Cal.AppAth 931, 952; CEQA Guidelines sections 15125(a); 15126.2(a). Incidentally, the Guidelines require that environmental documents such as the DPEIR analyze the Project's impacts on land use for "any applicable habitat conservation plan or natural community conservation plan." The Guidelines regards such impacts as land use impacts and yet the DPEIR contains no discussion of such impacts. For all of these reasons and others, the Regional Council should revise the RTP to appreciate local land use plans, revise the DPEIR to fully consider and analyze the Project impacts on land use, and revise the DPEIR and the RTP as indicated above. III. Conclusion: The Regional Council Must Revise the RTP and the DPEIR and Recirculate these Documents for Further Review. As indicated throughout, the RTP and the DPEIR lack important specific details necessary to understand and comment on the Project, fail to provide adequate explanation and discussion of crucial issues including its conflicts with local land use plans, fail to discuss and explain the Regional Council's authority to craft its own "transportation/urban form strategies," and fail to provide adequate mitigation. For these reasons and</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					others, the RTP and the DPEIR must be revised and recirculated. Again, thank you for the opportunity to comment on the DPEIR for the RTP. We look forward to participating the in the public hearing process, receiving responses to these and other comments, and commenting on those responses at the appropriate public hearings. Please include us on all mailing lists for notices of further environmental documents for the Project and/or for the RTP as well as any and all hearings on these projects. Of course, should you have any questions, please do not hesitate to contact us.	
08-043	2/19/08	Taylor, Stephanie	Green LA	Letter	<p>1 of 3</p> <p>The GREEN LA transportation work group's goal is to move the City of Los Angeles towards eliminating auto dependency and making Los Angeles transit-pedestrian-and bicycle-friendly. Our current policy priorities are to: 1) use parking policy to reduce car dependency, 2) increase bus-only lanes, and 3) advocate for the creation of a pedestrian master plan. We are also working to increase the City's understanding and use of the complete streets model and believe complete streets is an important strategy to increase transportation access and choice. Complete streets are more than just conduits of travel. They are great places designed for everyone, including a number of modes and methods to get around. Beyond just creating space for us when we're driving, complete streets provide and prioritize viable transportation choices for people walking, biking, and taking public transit—transportation choices that are better for our health and better for the environment. Furthermore, because Los Angeles has provided cars more than their fair share of street space, we believe that every street project done in Los Angeles should prioritize, support, and enhance walking, biking, and public transportation to create complete streets – streets that also include a full canopy of trees for both the environmental benefits and for the comfort of pedestrians.</p> <p>2 of 3</p> <p>RTP Presentation - Environmental Justice (EJ) Analysis It would be more meaningful to residents if the EJ charts by quintile were also broken down by county and by the region. The aggregated data is not convincing. We are concerned about data for the county in which we live and work. The transportation investments chart would be helpful by transportation mode, particularly for an EJ analysis. For example, if low income people depend on transit, it would be good to know the percentage of the budget that is spent on transit. The data on the impact on air quality would especially benefit from mapping. Any data that could be mapped to show how investments/impacts specifically relate to communities disproportionately impacted by air pollution, such as near the ports, LAX, near 710 freeway would be very illuminating and much more useful.</p> <p>3 of 3</p> <p>Public Participation: The staff has expressed their willingness to give presentations to groups and they seem to genuinely want to engage people, however, from what I observed from last night's meeting, there is much SCAG can do to improve engagement. I offer the following observations to</p>	<p>1 of 3</p> <p>Comment noted. The Safety and Non-Motorized Supplemental Reports, and the 2008 RTP all recommend incorporating complete streets policies - providing safe access for all modes - as fundamental principles of transportation plans. In addition, The Safety Supplemental Report in the 2008 RTP notes that the State, as part of the Strategic Highway Safety Plan, intends, as a strategy to "incorporate bicyclists into smart growth, land-use planning and other local plans."</p> <p>2 of 3</p> <p>The intent of the 2008 RTP Environmental Justice Analysis is to inform transportation decisions so that low-income and minority communities have ample opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2008 RTP Environmental Justice Supplemental Report evaluates region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits or burdens various demographic groups are anticipated to experience as a result of the RTP. For a detailed description of the results, please refer to the 2008 RTP Environmental Justice Supplemental Report. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications. SCAG will continue to work with stakeholders to address Environmental Justice in the transportation planning process.</p> <p>3 of 3</p> <p>SCAG has made available a new RTP brochure completed in February designed to highlight the key challenges within the region, the key projects in the RTP, and the potential funding strategies to pay for those projects. We have created the brochure to be user-friendly and interesting to enhance the reader's appreciation and knowledge as to what is in the plan. The brochure is available at SCAG presentations, in our lobby and online at SCAG's website, www.scag.ca.gov. In addition to the brochure there is a RTP Fact Sheet and RTP power points also available on the web. In accordance with SCAG's Public Participation Plan, all comments</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					improve the public's ability to meaningfully provide feedback on the RTP. First, the plan needs to be explained. It is difficult to know what sort of feedback is useful. It would be helpful to know, for example, the sort of feedback that SCAG can act on, such as policy, vision, priorities, etc. and what SCAG can not act on, for example, what projects are included in the RTP. Asking the public to comment on the plan without any further information is overwhelming. Secondly, we need to know why our input is important, what it will be used for, and how it impacts the report. Lastly, partnering with non-profits and advocacy groups will result in increasing the participation of the general public. For example, co-sponsoring meetings, and conducting a training on the RTP for staff (and residents) in advance of a presentation would be helpful. The online survey seems to indicate that SCAG is interested in knowing people's resource allocation priorities and transportation modes. Having the online survey in hard copy available to people who attend a presentation would be helpful. Also, tell us how the survey information will be used.	received will be reviewed and considered in the deliberations on the Final 2008 RTP. In addition, all other comments received on the RTP have been posted on SCAG's web site and the responses to those comments will be posted once they are available. The RTP Survey will be used in the Summer of 2008 to help inform the Transportation and Communications Committee on transportation priorities for those living in the region. SCAG worked with other organizations, non-profits, community groups, and chambers of commerce in maximizing the exposure of the draft RTP by proactively getting on organizational agendas and making presentations. We would not have been nearly as effective in our outreach efforts without the assistance of these organizations.
08-044	1/23/08	Fischer, Laura	Holtville, City of	Public Hearing	I'm from the City of Holtville in Imperial County. The City of Holtville fully supports a financially constricted project which is ARSA project, 6N400E, which is the State Rout 115 to I-8 Intersection, and we will submit a written comment as well.	Comment noted. This project (RTP ID 6M0400E) is included in the 2008 RTP.
08-045	12/21/07	Ramos, Ricky	Huntington Beach, City of	Letter	In the table below we identify census tracts located in the City of Huntington Beach where we believe the SCAG Policy Forecast for additional household and/or employment growth beyond what is identified in the 2006 OCP is too high and therefore unlikely to occur. Household Growth - 992.20, 992.42, 993.05, 993.07, 994.02, 994.11, and 994.13. Employment Growth - 992.20, 993.07, 994.02, 994.11, and 994.13 Some of these areas are already built out and others contain constraints such as wetlands.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Huntington Beach is consistent with the OCP - 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables related to the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-046	1/17/08	Ramos, Ricky	Huntington Beach, City of	Letter	Last month the City of Huntington Beach provided comments on the Draft 2008 SCAG Policy Forecast. In our letter (12/17/07) we identified census tracts located in the City of Huntington Beach where we believe the SCAG Policy Forecast for additional household and/or employment growth beyond what is identified in the 2006 OC Projections. As requested, we are now providing specific reasons for our prior comments below: 992.20 (both) - the only vacant land is either wetlands or landfill land to be developed for open space only. 995.42 (household) - the only vacant land is designated for commercial use. 993.05 (household) - the only vacant land is designated for commercial use. 993.07 (both) - the area has recently been redeveloped and there is no vacant land. 994.02 (both) - the maximum build out of vacant land will provide additional 62,500 sq.f. of commercial and 8,000 sq.f. of industrial and 0 dwelling units. SCAG forecast is for additional 483 households and 1,002 jobs. 994.11 (both) - no vacant land. 994.13 (both) - area has recently redeveloped as part of a master plan; maximum build out of vacant land will provide additional 62 dwelling units, 17,200 sq.f. of commercial and 130,000 sq.f. of industrial building. SCAG forecast is for additional 1,039 households and 2,360 jobs. SCAG's Policy Forecast projects an additional 2,843 households for the above tracts, Huntington Beach projects	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Huntington Beach is consistent with the OCP- 2006,as documented in the 2008 RTP Growth Forecast Report). Text and tables related to the Policy Growth Forecast in the 2008 RTP have been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					that they can accommodate no more than 1,400 households (tracts 997.03 and 996.05). It is recommended that the household growth should be channeled along Beach Boulevard.	
08-047	1/23/08	Box, Stephen	Illuminate LA, Bike Writer's Collective	Public Hearing	I live in L.A. I'm an avid cyclist, and I'm a cycling advocate. It would be great to have an evening option for these meetings. In reviewing the RTP, I identify myself as a cyclists and I think of myself as a pedestrian as well, sometimes as a motorist but never as a non-motorized thing. So it would be great if we could use the word "bicycle" as opposed to "non-motorized." So we could speak in the affirmative of what we are as opposed to identifying ourselves based on what we're not. My third comment is it would be super if SCAG could accommodate routine accommodations or Complete Streets Philosophy or standard so that any roadway projects or improvements, routinely and without special accommodations, include amenities for pedestrians, cyclists, mass transit users, as well as motorists. It tends to be the reverse now that improvements are based on accommodations for motorists and that if there's anything left over with regard to the space, funding, materials, or opportunity in the community, then the other user groups may or may not get accommodated. But it is not the default position. It is the standard that must be routine. So on that note, I'd like to say that there is a significant movement within the cycling and pedestrian community to consider equal access to be a civil rights issue, and we're starting to look at that in terms of equal access at the expense of another, it's actually a civil right violation.	Comment noted. In order to address this comment, SCAG will change the terminology in the RTP and Non-Motorized Supplemental Report to more accurately reflect mode of travel, however the title of the supplemental report will stay the same. The Non-Motorized Supplement Report includes a Caltrans policy based on the AASHTO statement. "In 2002, Deputy Directive 64 (DD-64) created a policy which directed Caltrans to 'fully consider the needs of non-motorized travelers (including pedestrian bicyclists and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.'" The Draft RTP in Chapter 3 and in the Supplemental Report, recommends to increase accommodations and planning for bicyclists and pedestrians. In the future, we will consider conducting some of our public hearings during the evening hours as requested.
08-048	2/19/08	Ham, Bob	Imperial County	Public Hearing	1) Pages 9, 67, and 117 contain identical information relating to cross border activity for "Explosive Growth in Goods Movement", and "Spotlight on Goods Movement". The information contained requires additional language to reflect information provided when describing the rest of the ports within the SCAG region. In addition, the data presented (1994 – 2005) was for the most part used on the 2004 SCAG RTP. Since the passage of the North American Free Trade Agreement (NAFTA), crossborder trade activity between the State of California, United States and the State of Baja California, Mexico has increased to record levels and resulted in positive economic conditions regionally and statewide. 2) Page 67, Table 2.6 Daily Truck Volumes by Corridor, It would be important to include SR 111 as the facility plays a key role in goods movement from the U.S./Mexico border to the rest of California and the nation. 3) Page 112 under Goods Movement / Logistics, information on land ports of entry needs to be included. 4) Page 118 under Port Access Improvements, information on land ports of entry needs to be included. 5) Pages 118 to 126, need to add information on grade separation projects for Imperial County	1. Please refer to RTP Supplemental Goods Movement Report. It has a discussion on cross-border trade activity. 2. We will incorporate SR-111 to the referenced table. 3. The commentor is referring to a section on High-Speed Regional Transport. The 2008 RTP does not include a HSRT system in Imperial County. Ports of Entry in Goods Movement in discussed later in the chapter. 4. We will include discussion of land Ports-of-Entry and the Brawley Bypass project. 5. SCAG will work with appropriate IVAG staff to identify grade separation projects for inclusion as appropriate.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-049	2/19/08	Heuberger AICP, CEP, Jurg	Imperial County	Letter	<p>1 of 15</p> <p>The Imperial County Planning & Development Services Department found the RTP significantly lacking in several areas when it came to Imperial County. We understand that when it comes to SCAG's six (6) Counties, Imperial County does not "rank" in terms of population, traffic, employment, and revenue generation, but this document fails to adequately plan for Imperial County. In some cases Imperial County is only briefly discussed, with minimal analysis, while in other cases Imperial County is simply not brought up. It does not appear that SCAG did a comprehensive assessment of Imperial County. If this document is designed to truly be a "regional" plan for the various forms of transportation from 2008 through the year 2035, than a more thorough review of Imperial County, its roads, rails, aviation, air quality, economic make up, land use, and published documents is gravely needed. We particularly ask that the County's "50" year Circulation Element be considered. It is our understanding (perhaps misunderstanding) that SCAG in preparing the RTP does not fully review General Plans of a County/City or at least not in detail. We think (if true) that this is necessary! SCAG does a great job in the RTP in explaining the regional goals and objectives for Southern California; it is only when it comes to detail analysis that it is weak as it pertains to Imperial County. The following are the Department's concerns presented on behalf of the County.</p> <p>2 of 15</p> <p>The RTP is unclear regarding air quality emissions, Chapter II, Transportation Planning Challenges, page 70, what SCAG's plan is for appropriate air quality mitigation within the SSAB and possible future exceedances of the National Ambient Air Quality Standards (NAAQS) under the Clean Air Act due to increased train trips through the County. It does not seem that with double tracking the UPRR vastly increased train traffic in adequately considered. The RTP states that "...Of additional concern are the upcoming 24-hour PM2.5 standards, which will require even greater reductions as well as possibly more stringent ozone standards. Consequently, the ARB, SCAQMD, and SCAG are committed to producing a white paper that identifies strategies to address the shortfall issues..." Since Imperial County is "downwind" of the SCAQMD area and its pollutant "carrying capacity", it is important to control mobile (all) air emissions from the SCAG region that affects Imperial County residents. Any mitigation measures to improve the air quality in the SCAQMD region will also improve the SSAB's air quality as well. However, the "Mitigating Environmental Impacts" and "Summary of the "Environmental Mitigation Program" commencing on page 127, and discussed on page 132, does not provide for any future SSAB mitigation measures for the downwind emissions from the SCAG region and addresses only the SCAQMD area. This is also mentioned in the "Performance Measures Report", pages 17 and 18, stating that "...SCAG uses the environmental justice analysis to help its elected officials make transportation planning decisions fairly. The analyses are designed to assure that benefits and burdens are not distributed unfairly across populations in the region...the recommendation is to work with the</p>	<p>1 of 15</p> <p>The 2008 RTP does not single out individual counties for analysis. Rather, the region as a whole is examined for transportation needs and improvements. SCAG coordinates with the Imperial Valley Association of Governments for input to the RTP regarding Imperial County.</p> <p>2 of 15</p> <p>The mitigation program outlined in the Section "Mitigating Environmental Impacts" includes a summary of the mitigation measures in the 2008 RTP PEIR. This general description is intended to provide a broad description of the PEIR mitigation measures. Chapter 3.2 Air Quality of the PEIR, specifically incorporates by reference mitigation measures from the relevant air quality plans around the region, including Imperial County Air Quality Management Plan (2008 RTP PEIR p. 3.2-24) This section also includes a detailed summary of pollutants by county and air basin. The PEIR also includes a summary of Greenhouse Gas emissions by county. Further, as noted by the commenter, Imperial County's "downwind" position relies on reductions from upwind areas (e.g., South Coast, Mexico, etc.) to demonstrate attainment of the federal air quality standards. The text of the RTP has been updated to reflect the air quality mitigation measures included in the PEIR. The PEIR includes regional scale air quality impacts analysis and mitigation measures to reduce air pollution throughout the region, including in the SSAB, as appropriate for a program level document. Further, as individual infrastructure projects (including goods movement projects) in the RTP are developed they will undergo site specific analysis to determine project level impacts and mitigation measures as appropriate. See also Master Response No. 2 regarding Program EIR versus Project/Site Specific EIR, Section III, Final 2008 RTP PEIR. It is also noted that the intent of 2008 RTP Environmental Justice Analysis is to ensure that when transportation decisions are made, low-income and minority communities have an opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2008 RTP Environmental Justice Analysis evaluates SCAG region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits or burdens various demographic groups are anticipated to experience as a result of the RTP.</p> <p>3 of 15</p> <p>Stakeholder agencies throughout the region identified priority grade separations that were analyzed in the Inland Empire Railroad Main Line Study. SCAG is aware of the increasing significance of goods movement issues in Imperial County, and will continue to work with stakeholders and seek input in our future plans and studies. For</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>South Coast Air Quality Management District (SCAQMD) to include their Urban Airshed Model (UAM) in the environmental justice analysis..." Another discussion is in the "High-Speed Regional Transport Report, page 17, in entitled "Environmental Considerations/Health Impacts from Goods Movement Sources", that states "...Significant adverse community health and safety impacts are linked to air pollution from Southern California goods movement system. A recent CARB assessment of PM2.5 health effects shows a disproportionate exposure in the South Coast Air Basin relative to other parts of the state and to the rest of the nation...The goods movement system, along with construction equipment, is a primary source of PM2.5 emissions...full environmental feasibility studies will be needed to be performed..." The RTP and FEIR need to address the increased air quality impacts that will impact local minority and low-income residents along this rail corridor by the increased number of trains. Also, the air quality section of the PEIR should address the "inter-district transfer" of air pollutants from Riverside and San Bernardino into and through Imperial County. The Salton Sea Air Basin (SSAB) will be increasingly impacted and the Imperial County Air Pollution Control District will need to reflect this new source of air pollution in its future air quality planning efforts.</p> <p>3 of 15</p> <p>The RTP identifies 131 proposed grade separation rail road crossings, none of which are located in the Imperial County. As the RTP states Union Pacific will be double tracking its rail line from the Alhambra to Yuma. The County Planning and Development Services staff has recently met with representatives of the Union Pacific Railroad regarding the "double-tracking" of the existing railroad tracks from Indio to Yuma, Arizona. When this "double-tracking" is completed, the number of trains through Imperial County will increase from approximately 46 trains per day to over 92 trains per day according to the Union Pacific representatives. Union Pacific also has a rail line from Calexico/Mexico to Niland where it connects to the Alhambra to Yuma line. The RTP needs to be revised to look at potential grade separation rail road crossings throughout the developed areas of Imperial County. Several intersections in the County, according to U.P & CPUC need grade separated configurations, such as; McCabe & Dannenberg Road, Highway 111 & Hot Mineral Spa Road; possibly Highway 78 at Glamis, etc. The inter-County rail line from San Diego County to Imperial County, San Diego & Arizona Railroad, has been proposed to re-open for commercial operations. This would include the movement of goods, aggregate, sand and gravel materials into the Counties of Imperial and San Diego. The re-opening of this important link between San Diego County and Imperial County was not identified in the RTP. Please revise the RTP to include the re-opened rail line for both rail network and for possible future funding and for regional information to stakeholders. This re-opened rail line can assist in increasing NAFTA imports and exports to and from Mexicali, Mexico, into the Southern California region.</p> <p>4 of 15</p> <p>The RTP has no mention of Imperial County's regional transit system. There is</p>	<p>project listings pertaining to Imperial County, SCAG recommends local jurisdictions coordinate with Imperial Valley Association of Governments so that necessary projects will be submitted for the RTP listing through IVAG.</p> <p>4 of 15</p> <p>Comment noted. For project listing pertaining to Imperial County, SCAG recommends local jurisdictions coordinate with Imperial Valley Association of Governments so that necessary projects will be submitted for the RTP listing through IVAG.</p> <p>5 of 15</p> <p>The RTP identifies \$1 billion in funding through 2035 for arterial improvements in Imperial County. The RTP is a financially constrained plan and improvements are limited to available funding.</p> <p>6 of 15</p> <p>Comment noted. The Brawley Bypass is contained in the 2008 RTP Constrained Plan, not the Strategic Plan. The project identified in the Strategic Plan (RTP ID# UIMP0021) is not the Brawley Bypass, but a project whose limits include the Brawley Bypass (note that the "Brawley Bypass" is contained in the "From" column).</p> <p>7 of 15</p> <p>The 2008 RTP does not single out individual counties for analysis. Rather, the region as a whole is examined for transportation needs and improvements. SCAG coordinates with the Imperial Valley Association of Governments for input to the RTP regarding Imperial County.</p> <p>8 of 15</p> <p>1. The commuter designation for Imperial Airport (IMP) relates to its current status, not its potential service in 2035. This point will be noted in the Final 2008 RTP. The Draft 2008 RTP forecasts an air carrier airport at IMP reaching 3.5 MAP in 2035, which is significantly higher than the other recent forecasts for the airport. 2. The Final 2008 RTP will mention that IMP has potential to serve as a regional cargo airport serving cross-border air cargo activity. 3. NAF El Centro was not a subject of past military air base planning conducted by SCAG since, as noted by commenter, only closed or downsized military air bases were studied in terms of their potential to serve as commercial airports. SCAG does not conduct any planning studies for active duty military air bases unless they express interest in joint civilian/military use.</p> <p>9 of 15</p> <p>The Imperial County Bicycle Plan provided to SCAG was dated September 2003, and did not provide a listing or graphic of existing facilities, only the recommended facilities. Imperial County has provided a listing via e-mail, and it will be incorporated. The referenced correction will be addressed in the Final RTP. SCAG has provided existing conditions only in the 2008 RTP, as several</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>a countywide bus based transit system. Providing commuters access to the major cities in the county as well as shuttles to San Diego and Yuma. The information is provided in the County's General Plan, Circulation/Scenic Highways Element, and it needs to be addressed in your RTP. We ask this only because we don't know if IVAG has responded to this posed the questioned</p> <p>5 of 15</p> <p>The County has recently revised the General Plan, Circulation/Scenic Highways Element, on October 17, 2006. The Element has a fifty year build-out with identified road classifications, and right of way. The RTP fails to identify Imperial County arterials or even references the County's General Plan. It is imperative that SCAG assist Imperial County in its continuing efforts to reduce congestion in local cities, to promote local transportation planning and ensure that future financing for transportation projects is provided in an effective and efficient manner. (see also paragraph 3, page 1)</p> <p>6 of 15</p> <p>As SCAG is aware, there is a continuing transportation issue as it relates to the "Brawley Bypass" and the funding of future development projects within Imperial County for alleviating congestion and promoting better regional/transportation strategies. The existing and proposed residential, commercial and industrial projects that have been submitted and discussed to both the County and the seven Cities will have a tremendous impact on future traffic planning by CALTRANS, the seven Cities and the County. The "Brawley Bypass" is mentioned last in the "Project Listing Report", pages 193- 194, under the title, "Strategic Plan Projects" and states "...The following is an illustrative list of additional investments that the region would pursue if additional funding were to become available, and after further consensus building is undertaken to solidify commitment around specific project scopes and strategies. These projects are not part of the financially constrained RTP..." (emphasis added). The "Highways and Arterials Report", page 13, entitled the "The Baseline 2035 System/System Description" identifies the "Brawley Bypass" and states that "...SCAG has assessed the future transportation system performance under the assumption that the Baseline projects committed in the Regional Transportation Improvement Program (RTIP) will be completed. Examples of major Baseline projects include: "The Brawley Bypass in Imperial County" as the first bulleted item. It is important for the RTIP addresses funding as a priority for completing the "Brawley Bypass" as a very important NAFTA link, United States from/to Mexico, and the future movement of goods into the Southern California region via State Routes 111 and 86.</p> <p>7 of 15</p> <p>The long-range vision that SCAG has for Imperial County is discussed in very general terms in the RTP but does not focus on critical transportation needs of the County. It is critical that SCAG assist the County in its continuing efforts to reduce congestion on the two Mexican border crossings, local County and City roads/streets/intersections, promote transportation planning and ensure that future financing for transportation submitted projects is provided in an</p>	<p>counties did not have proposed facilities available.</p> <p>10 of 15</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Imperial County is consistent with the 2035 consensus input as agreed by IVAG and Caltrans District 11, (see the 2008 RTP Growth Forecast Supplemental Report). All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>11 of 15</p> <p>Comment noted. SCAG recommends that the County coordinate with IVAG so that transit projects will be submitted for the RTP listings through IVAG.</p> <p>12 of 15</p> <p>The 2008 RTP PEIR provides an inventory of greenhouse gas emissions in Chapter 3.2, Air Quality. This chapter analyzes impacts and includes mitigation measures. There is also a comprehensive discussion of greenhouse gas emissions and mitigation measures in Chapter 3.5, Energy. SCAG incorporated mitigation measures developed by the Attorney General where practical and feasible. A table listing which mitigation measures were included in the Draft PEIR, Appendix B.</p> <p>13 of 15</p> <p>SCAG recognizes the difficulty of depicting the entire region in adequate detail. SCAG will continue to evaluate ways to improve the depiction of regional improvements in its maps.</p> <p>14 of 15</p> <p>The RTP and development monitoring concerns are noted and acknowledged. Please note SCAG can not use nor account for the 2010 Census for the 2008 RTP. As required by federal law, all projections have to use the most up to date information.</p> <p>15 of 15</p> <p>SCAG's adopted RTIP forms the core part of the RTP and provides the basis for the projects, programs, and strategies that constitute the plan. The RTIP projects are listed in the Project List Supplement Report.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>effective and efficient manner. If there is information that SCAG needs from the County or IVAG please let us know. As discussed in the "Goods Movement Report", page 5, "Cross-Border Trade Activity", it states that "...The Calexico POE was the second busiest land crossing along the California/Baja California border with approximately 17 million people crossing northbound in 2003 and 600,000 annual truck crossings...Caltrans estimates that border trade activities will continue to grow, with approximately 5.6 million border crossings expected by 2030...a Union Pacific (noted earlier above) rail line connects Mexicali in Baja California to Calexico and El Centro in Imperial County. This line handles approximately 160 railcars per day, six days a week..."</p> <p>8 of 15</p> <p>The Imperial County Airport has recently been designated as an "International Airport" not a commuter airport as noted in the RTP and the Aviation report/appendix. Imperial County spend a considerable amount of time and funds developing a comprehensive study for a "Regional Cargo/Passenger Airport" being sited in Imperial County along with a High-Speed Rail service from San Diego to Phoenix, very similar to SCAG's proposed HSRT system. The Study recommended that the County's existing Imperial County Airport be relocated and incorporated into the Regional Cargo Airport. The RTP hences the majority of its hopes into one scenario, that of the taking the relatively small Palmdale airport and making the regional airport for the Los Angeles basin, and develop the HSRT system to support it. It is hereby requested that the Imperial County Regional Cargo Airport Study supplied to SCAG last year be incorporated into the RTP and that the RTP along with the Aviation report/appendix be amended to reflect Imperial County's goals and objectives for a regional cargo airport. The "Aviation and Airport Ground Access Report", page 4, entitled "Military Air Base and Air Cargo Planning in the 1990s", discusses military air bases and air cargo planning efforts. There is no discussion on Imperial County's Naval Air Facility, El Centro nor could the Department find it identified on any of the maps in the RTP. The local Naval Air Facility, El Centro, is not one of the proposed military base closures. The Facility is in fact currently updating its "Air Installation Compatibility Use Zone (AICUZ)" plan and there are plans to increase the number of aircraft utilizing the air base in the future. The SCAG aviation planners should contact the Commanding Officer, at (760) 339-2524, to obtain further information on future air operations planned at the air base for inclusion in the above Report. The County of Imperial has had a strong relationship with the Navy and has through land use regulations made every possible attempt to maintain an appropriate buffer around the Naval Air Facility, El Centro, and will continue to do so for the perceivable future. NOTE: this may not be an issue, as we understand the RTP only addresses bases scheduled for closure. We have included the comment only to reflect that while NAF is not scheduled for closure and happed not to be scheduled. However its location significantly affected the location of the proposed regional airport, due in part to air space issues and restrictions.</p> <p>9 of 15</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>The non-motorized transportation portion of the RTP and its report/appendix identify Imperial County has being having a Bicycle Master Plan, however there are three errors regarding the County's Plan. First the Table 5 on page 15 denotes that Imperial County has no Class 1, class 2, or Class 3 bicycle routes that is worry. Please refer to the 2007 Imperial County Bicycle Master Plan submitted to SCAG last year for details on Bicycle routes. There is an error in Table 5 (different table 5) on page 11 of the non-motorized transportation report which shows that Imperial County's Bicycle Master Plan started in 2003 and was updated in 2007, while in the preceding text it correctly identifies the 1999 date as to the first approved plan. Additionally, Imperial County is the only county that does not have a graphic exhibit (map) denoting its bicycle facilities. Please revise the non-motorized transportation report correcting these three errors.</p> <p>10 of 15</p> <p>As it pertains to growth in the region the RTP is weighted heavily on the western "Urban" cores as denoted on pages 32, 33, 47, 87 through 91, and in various reports/appendixes. According to the RTP Imperial County is a "Growing Periphery" which is the direct opposite of the urban cores to west where developable land is all but nonexistent. Imperial County has enormous land reserves for residential and industrial development. The RTP needs be revised to reflect the potential growth of Imperial County, eastern Riverside County, and San Bernardino County. The RTP needs to look more at development of new cores with a strong emphasis on jobs housing balance, using some of the numerous techniques identified for the western urban areas to create centralized area, and to help us not repeat the western urban cores mistakes of the past. There is a opportunity to create satellites urban areas in SCAG's region that will not have an adverse affect on the regional traffic system, that will minimize sprawl by centralizing the jobs to these eastern cores, thus reducing the need to commute to the western urban cores. Imperial County has over 6,500 acres of industrial land ready for development in the Mesquite Lake Specific Plan and the Gateway of the Americas Specific Plan Areas. These two industrial areas can handle all levels of industrial uses from light to heavy. The County's proximity to the United States Mexico border coupled with NAFTA, lends itself to become a major industrial job center. The County of Imperial and its seven cities have in the planning process over 30,000 dwelling units in various stages of development. The County has a development map and listing of projects that is continually being updated and other City/County projects are added in the future as they are submitted. For further information on these projects, please contact my office and/or the applicable City planning staff in Brawley, Imperial, El Centro, and Calexico.</p> <p>11 of 15</p> <p>In the "Environmental Justice Report", page 21, it states that "...It is critical for SCAG and policy-makers alike to ensure that their transportation programs, policies, and activities serve all segments of the region without generating disproportionately high and adverse effects...Accommodating the anticipated growth in the SCAG region in a sustainable way – by taking account of</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>ecological, economic and social justice factors, while enhancing quality-of-life for present and future generations – represents the central challenge facing regional transportation planning in Southern California...”</p> <p>12 of 15</p> <p>The Green House Gas emissions issues are only briefly discussed on page 72 and again in the air quality appendix. It is anticipated that a more comprehensive analysis fitting the intent of AB32 will be prepared for the Environmental Impact Report. If not the Department fears that the State Attorney General will take issue with the RTP, which is by far the single biggest emissions plan proposed since the adoption of AB32.</p> <p>13 of 15</p> <p>The regional maps used throughout the RTP and the reports/appendixes for example pages 57 through 61 are very difficult to read. The maps are 8x10 and have a small box in the upper left corner denoting Imperial County. Because of the scale used the data superimposed on these base maps are all but impossible to view. The graphic depiction of data is only as good as what the average reader can view, read and extrapolate data from. It also near impossible to read the legends. redo all maps that are intended to depict Imperial County to a scale that can be viewed by the naked eye and not require a magnifying glass. The Department has a fundamental question on the process (and ultimate value) of the RTP. While we are aware of the state and federal mandates which underlie the Plan, the process appears faulty. How can the RTP be a long term document when it is completely revised every four years? A four year (major) revision cycle seems less than “visionary.” How does SCAG do a true analysis on a plan that within only one year of adoption establishes the first step for its own revision (as identified on page 39), as being to “...review and update...the basic assumptions in the existing RTP, including the goals and objectives...”? In essence, the existing RTP is newly adopted and yet is already being scrutinized with barely any track record. Traffic analysis, we would all agree, is a long term proposition involving dynamic variables including changes in traffic patterns, development of infrastructure, and air quality assessments, etc. These all take time to establish...and time to evaluate. A related issue involves the Regional Traffic Improvement Plan (RTIP). If the RTIP is intended to represent the first six years of the RTP (as denoted on page 42), but the RTP is only valid for four years before getting revised, then the RTIP can never truly meet its mandate. It is our opinion, therefore, that the RTP is not so much a long term plan as much as it is a current plan with aspirations of a twenty plus year forecast. Perhaps we don’t fully understand the process and it has been suggested that this is more a question for the Federal than SCAG. Nevertheless there seems to be some inconsistency?</p> <p>14 of 15</p> <p>The demographic data identified on page 47 and used throughout the document relies heavily on the State of California Department of Finance which, in turn, uses the 2000 federal census as its base data stream and generates new estimates every January, based, in part, on extrapolating births</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>minus deaths. Our concern is that as the data stream gets further away from its original source, in this case the 2000 census, it tends to become more and more skewed as it pertains to the key variables of population, households, ethnicity, socioeconomic status, etc. With the 2010 census only a few more years away, it is highly conceivable that the demographic base utilized in the RTP could be “out of sync” with the newly released federal census data midway through its four year time frame, resulting in major calculation errors. How has SCAG accounted for the 2010 census and its inevitable change to the population assumptions in this RTP? What is the measure of error built into this RTP?</p> <p>15 of 15</p> <p>SCAG’s Regional Transportation Improvement Program (RTIP) is mentioned in the “Public Participation and Consultation Report”, page 44, which is a capital listing of all transportation projects proposed over a six-year period and amended several times a year. This capital listing identifies specific funding sources and funding amounts for each project and federal law requires that the RTIP be consistent with the RTP. Within the 2008 Final RTP forecasting future possibilities to the year 2035, the RTP and Program EIR should mention the above potential projects for informational and possible future funding purposes. We all need to continue to enhance efforts to develop and nurture relationships with elected and public officials throughout the SCAG region, especially for Imperial County that is a traditionally under-represented area in this region. Without SCAG’s full support of transportation and aviation projects, e.g. the Brawley Bypass, re-opening of the San Diego & Arizona railroad line, NAF/El Centro proposed expansion activities, Imperial County needs to continue to have appropriate financing mechanisms to have see future projects successfully implemented in a timely manner. It is important for SCAG staff and its member agencies to realize that the existing, proposed and future growth of the County of Imperial is dependent upon adequate support and funding for future transportation projects that implement the transportation mitigation programs and measures, e.g. increasing rideshare, investments in non-motorized transportation, goods movement capacity enhancements, and key transportation investments targeted to reduce heavy-duty truck delay. The continuing existing delays along the two Mexican international border crossings in Imperial County through Calexico and the East Border Crossing are becoming longer and longer and additional traffic/travel lanes are needed in the very near future to reduce congestion and reduce the ever-increasing air pollution from automobiles and trucks that are stalled in line.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-050	2/15/08	Joyce, Sean	Irvine, City of	Letter	<p>1 of 4: Remove policies and mitigation measures in the draft RTP and DPEIR that are not related to transportation project delivery and implementation. As stated, SCAG, as the designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, including Orange, Los Angeles, San Bernardino, Riverside, Ventura, and Imperial counties, is responsible for the development of a Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) and for ensuring that the plan and program meet the air quality conformity requirements of the federal Clean Air Act.</p> <p>SCAG's additional functions include intergovernmental review of regionally significant development projects, periodic preparation of the RHNA, and serving as the area wide wastewater treatment management-planning agency under the federal Clean Water Act. In accordance with State law as discussed, land use authority belongs to local jurisdictions. The State requires that cities have approved General Plans to plan for future growth. The City of Irvine has an approved General Plan, which designates land use types and intensities. Irvine has been internationally recognized as a master planned community, well known for its quality of life. Irvine is unique as it was developed in accordance to a master plan that carefully considered the balance of population and employment; provisions of public land for parks, open space, schools, and public facilities; and construction of infrastructure to support the land use designations, including streets, sidewalks, bikeways, and transit corridors. Implementation of the proposed SCAG RTP land use plan would seriously undermine this effort, and as stated in the introduction to this letter, would be inconsistent with SCAG's legal authority. Several of the policies and mitigation measures contained in the RTP and associated DPEIR include measures related to land use policies. While the federal SAFETEA-LU contains policies that encourage regional land use coordination, it does not expand SCAG's authority to dictate land use. Both the Plan and the Envision alternatives call for land use designations, patterns, intensities, and policies that do not comply with the City's well-balanced General Plan. Additionally, SCAG's plan forecast differs significantly from demographic assumptions of Irvine's General Plan. At the census tract/traffic analysis zone level, locations of future growth according to SCAG's Plan Alternative would shift significantly compared with Irvine's General Plan. This shift would increase population, employment, and housing growth and exceed the capacity of planned infrastructure. This growth is inconsistent with Irvine's well-balanced General Plan. The Draft RTP and DPEIR also include a land use map based on the policy growth forecast that designates the types and intensities of land use. As stated, SCAG does not have the authority to designate the land uses and development standards for cities within the region. Therefore, all maps or text related to designating land use and development standards should be removed from the 2008 Draft RTP and DPEIR. It is also important to note that we have identified a number of errors in the land use demographic assumptions and policy mapping that we</p>	<p>1 of 4 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Irvine is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 4 See response to comment 1.</p> <p>3 of 4 OCTA's project list is already included in the 2008 RTP Project listing.</p> <p>4 of 4 Comment noted. Based upon consultation with RCTC and OCTA, the construction portion of the CETAP Riverside County to Orange County "Corridor B," connecting Corona and Irvine, has been moved into the Strategic Plan. The RTP Constrained Plan will include only preliminary engineering and environmental work for this corridor.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>previously provided to SCAG staff and are reiterating in this letter. These errors are reflected on a variety of graphics generated by the SCAG including but not limited to the Draft Baseline Growth Forecast map, the Draft Policy Growth Forecast map, and the Compass Blueprint 2 percent Strategic Opportunities Area map. While the City of Irvine acknowledges the efforts of SCAG to encourage more sustainable transportation corridors, the maps are not consistent with the City's land use maps. City of Irvine staff has expressed concerns with these errors to SCAG staff at previous meetings and workshops, yet corrections to the graphics have not been made. Examples include: - Areas that are identified for "Office Park" on the SCAG maps have an existing "Residential" land use designation. Residential projects with varying densities are either existing or planned for these areas. - Areas that are identified to be developed with higher residential densities are areas that have already developed with new residential, office, or retail uses. These areas will not be redeveloped within the time horizon identified in the 2008 Draft RTP. Areas identified for "Industrial" uses are within planning areas experiencing mixed-use development. According to SCAG's development standards, the residential density for "Industrial" areas is zero households per acre. The City is currently processing applications for mixed-use projects in several of these areas. The use of these erroneous assumptions demonstrates further serious flaws in the proposed policy. The City of Irvine requests a meeting with SCAG staff to discuss the specifics of these errors and provide a better understanding of the City of Irvine's land use planning efforts. Therefore, the City of Irvine requests that SCAG remove all policies, maps, development standards, and mitigation measures in the 2008 draft RTP and DPEIR that are not related to transportation project delivery and implementation, and remove mitigation measures with questionable requirements. Many of the mitigation measures of concern also appear to be draft Regional Comprehensive Plan policies that have been carried over into the 2008 RTP as proposed mitigation measures. As the RCP has not yet been formally released for public review, the use of RCP policies as mitigation measures that have no bearing on the mitigation of transportation project delivery should be removed from the DPEIR.</p> <p>2 of 4:</p> <p>Utilize the 2006 Orange County Projections (RTP Baseline) in any adopted 2008 RTP growth forecast, consistent with adopted policy directive from the boards of directors of OCCOG and OCTA. The RTP DPEIR analyzes three alternatives: the Plan, Envision, and Baseline. The Plan and Envision alternatives do not accurately reflect population and employment projections provided by Orange County Council of Government in 2006 (2006-OCP). The RTP and related DPEIR do not accurately reflect this data. The 2008 RTP includes discussion of two different demographic forecasts for the SCAG region between 2008 and 2035, including a baseline forecast and a policy growth forecast. SCAG's baseline forecast was developed through a bottom-up approach and is consistent with local general plans. In November 2006, the OCTA Board requested that SCAG use the 2006 Orange</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>County Projections (OCP-2006) as the basis for Orange County demographics in the 2008 RTP. The OCP-2006 is the countywide demographic dataset developed by the Center for Demographic Research with input from all 34 cities and the County of Orange. The baseline forecast is consistent with OCP-2006 in Orange County. The policy growth forecast, referred to as the "Plan" forecast, however, is shaped by the Compass Blueprint Program. The Plan is generally consistent with OCP-2006 through 2015. After that time, SCAG redistributes jobs and housing to cluster future growth around major transit corridors, transit stations, and job and activity centers known as "Areas of Opportunity". On a regional level, growth is shifted from inland counties to coastal counties in an effort to reduce vehicle miles traveled by more closely locating jobs and housing. Compared with the baseline growth forecast, the Plan forecast would add an additional 45,000 people, 15,000 households, and 9,500 jobs throughout Orange County by year 2035. Three areas of Irvine have been identified in the Compass Blueprint as "Areas of Opportunity", including the Irvine Metro (locally referred to as the Irvine Business Complex or IBC) and TOD in the areas around Irvine Station and Tustin Station. It is important to note that implementation of the City's General Plan will result in sustainable, politically acceptable growth in these areas. The high levels of growth that the Plan forecast assumes for these areas are not only inconsistent with the City's General Plan, they would likely result in significant negative impacts in State and federal environmental review focus areas such as public services (education, public safety, recreation), noise, visual impacts, public utilities, water resources, and biological resources. In addition, the Plan forecast does not account for land use constraints such as open space and hazard areas, nor does it recognize existing project approvals or land use designations. Although the SCAG Regional Council will have an opportunity to select either growth forecast when the final 2008 RTP is adopted, the draft 2008 RTP refers almost exclusively to the Plan forecast, and the draft finding of air quality conformity was based on that forecast. In addition, the DPEIR does not include analysis of a specific alternative that links the baseline growth forecast with the planned transportation improvements, such as Renewed Measure M, that are planned throughout 2035. As such, the DPEIR is insufficient because it does not look at all possible environmental impacts that may result from whichever alternative is adopted. The DPEIR alternatives should include a Baseline + Approved Transportation Projects alternative with an air quality conformance test absent of land use policies. Furthermore, the mitigation measures should be limited to transportation projects. However, recognizing that there is insufficient employment in Riverside and San Bernardino Counties to support the population, the City of Irvine would be supportive of incentives for job creation in those counties to reduce the congestion on freeways, such as State Route (SR) 91.</p> <p>3 of 4:</p> <p>Include OCTA's list of transportation projects submitted to SCAG for incorporation into the 2008 RTP, including corrections to the Constrained and Strategic Plans to accurately reflect the status of proposed projects. The RTP</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>consists of two major sections: a financially constrained plan and a strategic plan. The constrained plan includes transportation projects for which there are committed or "reasonably available" funding sources. The strategic plan identifies projects that do not have a complete funding plan or require further study and consensus building before moving into the constrained plan. All regionally significant transportation projects must be included in the constrained plan to move through the project delivery process and receive State or federal funding for design and construction. The following...controversial projects have been included in the Constrained Plan although neither project has identified "reasonably available" funding sources:</p> <p>a. Orangeline Magnetic Levitation Project (Orangeline Project): This project should be removed from the constrained RTP placed in the strategic plan until such time as full funding and local commitment are secured. These projects should be removed from the Constrained Plan, placed in the Strategic Plan, and a new air quality conformance should be conducted.</p> <p>4 of 4:</p> <p>Include OCTA's list of transportation projects submitted to SCAG for incorporation into the 2008 RTP, including corrections to the Constrained and Strategic Plans to accurately reflect the status of proposed projects. The RTP consists of two major sections: a financially constrained plan and a strategic plan. The constrained plan includes transportation projects for which there are committed or "reasonably available" funding sources. The strategic plan identifies projects that do not have a complete funding plan or require further study and consensus building before moving into the constrained plan. All regionally significant transportation projects must be included in the constrained plan to move through the project delivery process and receive State or federal funding for design and construction. The following...controversial projects have been included in the Constrained Plan although neither project has identified "reasonably available" funding sources:</p> <p>b. Riverside-Orange County Corridor: This project should be removed from the constrained RTP until such time as full funding and local commitments are secured, and the project's environmental impacts and constraints are addressed. This change would be consistent with the 2006 RTP. It should be noted that on October 25, 2005, the Irvine City Council adopted a resolution opposing the consideration of any proposed tunnel alternative that would be built in the Cleveland National Forest or link Interstate 15 in Riverside County to the State Route 133 Toll Road in the City of Irvine. These projects should be removed from the Constrained Plan, placed in the Strategic Plan, and a new air quality conformance should be conducted.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-051	2/19/08	Murphy, Alan	John Wayne Airport	Letter	1) Within the RTP Regional Aviation Policies (page 8 of the Draft Aviation and Airport Ground Access Report), one of the Aviation Guiding Principles is to "Reflect that the region as a whole has an obligation to help pay the costs of airport environmental mitigation and ground access improvement in counties that serve a disproportionate share of regional air travel demand at their airports." We would appreciate some clarification as to whether this principle was presented to and approved by the Aviation Technical Advisory Committee (ATAC) and/or the Aviation Task Force (ATF). Further, we request that this wording be changed to state that counties within the region should communicate regarding and, where appropriate, coordinate their efforts with respect to planning and implementation of airport ground access initiatives that cross jurisdictional boundaries. 2) On January 31, 2008, the Southern California Regional Airport Authority (SCRAA) Board of Directives voted to disband the organization. As a result of this action, we recommend that the Regional Aviation Policies associated with SCRAA be removed from the Aviation and Airport Ground Access Report.	1. The Aviation Guiding Principles incorporated as part of the new RTP Regional Aviation Policies were reviewed by the Aviation Task Force, and recommended for approval to the Transportation and Communication Committee (TCC). Input on these principles was also provided by the SCAG Aviation Technical Advisory Committee. The SCAG Regional Council, upon hearing a recommended action from the TCC, will consider approval of the Regional Aviation Policies as part of the requested approval of the Final 2008 RTP. Shortly after adoption of the Final 2008 RTP, SCAG intends to develop a Regional Airport Management Action Plan that will evaluate and identify potential mechanisms for implementing the Aviation Guiding Principles. It will also evaluate and recommend mechanisms and procedures for better inter-jurisdictional coordination to implement airport ground access initiatives that cross county boundaries, as well as better coordination between county transportation commissions and commercial airports in identifying and implementing high-priority airport ground access projects. 2. The Regional Aviation Policies will be revised to reflect the recent decision by the SCRAA to disband.
08-052	1/23/08	Arceo, Ruben	La Mirada, City of	Public Hearing	As the Community Development Director in the City of La Mirada, I'm excited about this RTP. It's important for our region. In La Mirada, we're planning for the long term. We do have some unique transit opportunities and design opportunities to maybe plan for transportation redistricts and things like that. SCAG's going to be an important resource for our city and our small planning department.	Comment noted.
08-053	2/19/08	Arceo, Ruben	La Mirada, City of, Community Development Dept	Email	Thank you for the opportunity to comment on the 2008 SCAG RTP plan. Based on my review, the 2008 RTP is an auspicious strategic undertaking to counter the growing transit problems commuters and communities are encountering within the Southern California region, and, which if not addressed will lead to a regressing in the quality of life of citizens in this state. The City of La Mirada appreciates the opportunity to comment on the RTP. La Mirada is located within a highly mature and developed commercial, industrial and residential sector of Los Angeles County. The city borders the communities of Whittier to the north, Santa Fe Springs to the east, La Palma and Cerritos to the south and La Habra and Buena Park to the north. The primary arterial corridors bisecting the City include Beach Boulevard, Imperial Highway, Rosecrans Avenue and Valley View Avenue and Interstate 5 Freeway. The city is located in a "hub" where future transit rail in conjunction with bus line service could be beneficial for this sector, especially where opportunities exist to serve the previous aforementioned cities. The location for a potential new rail station could be located at the juxtaposition of Stage Road and Valley View Ave. The proposed location either west or east of Valley View and Stage Road is in proximity of high density residential, commercial and industrial uses serving Santa Fe Springs, Cerritos and La Palma. The location is consistent with the Compass principles fostered in the RTP in that the location: Provides infill opportunities for mixed uses, Provides for housing near transit service,	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					Promotes land use patterns supportive of goods movement and logistic industries, is a development "node" serving a major corridor with links to others. Provides opportunities for "complete communities": To realize the node's future development potential, the City of La Mirada will need the consultant services, assistance and support of SCAG in helping to establish a JPA. The La Mirada Planning Division is not adequately staffed to take on a project of this magnitude that requires cooperation from many municipal agencies without the assistance of SCAG. La Mirada needs to strategically plan for such long term transit and mixed development contingencies if the City is to meet its RHNA requirements of 1,739 units prior to 2015. these services would include either access to GIS files and or software to assist the City, consultant assistance, etc. that is not offered by our local COG. La Mirada is desirous to comply with its RHNA requirements and partner with agencies to resolve transit issues. In kind, we are asking for SCAG to broker with adjacent cities to develop and assist in developing a "master community" development plan through a JPA which would be incorporated into the City's General Plan land use and circulation element that addresses the RTP concerns; and, is a yardstick in which to help La Mirada meet its land use and transit goals. Lastly, potential transit services could be further augmented on major arterials that bisect the city, such as on Beach Blvd. Imperial Hwy, and Valley View Ave. The time period for considering the augmentation of transit service along these corridors could be "ripe" given the I-5 Freeway future widening expansion through La Mirada.	
08-054	2/19/08	Di Mario, John	La Palma, City of	Letter	<p>1 of 2 The City continues to be opposed to use of the PE ROW for transit purposes. Attached to this letter are previously adopted resolutions of the City Council expressing their concern with potential quality of life impacts for the residents of LA Palma associated with the development of the ROW for MagLev. 2 of 2 The City has concerns with utilizing SCAG's Policy Growth Forecast data. The City recommends that SCAG use the 2006 Orange County Projections in any adopted 2008 RTP growth forecast.</p> <p>2 of 2 The City has concerns with utilizing SCAG's Policy Growth Forecast data. The City recommends that SCAG use the 2006 Orange County Projections in any adopted 2008 RTP growth forecast.</p>	<p>1 of 2 Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.</p> <p>2 of 2 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of La Palma is consistent with the OCP- 2006 (as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-055	2/19/08	Songstad, Jr., L. Allan	Laguna Hills, City of	Letter	<p>1 of 2:</p> <p>SCAG's adoption of a regional growth forecast for the 2008 RTP shall utilize, for Orange County, the Orange County Projections-2006 (OCP-2006) database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006. At a policy level, the City of Laguna Hills believes that: a) Recommendation #1 is consistent with adopted policy directive from the boards of directors of OCCOG and the Orange County Transportation Authority to use OCP-2006 as the basis for Orange County demographics in the 2008 RTP. b) OCP-2006 accurately represents the distribution and amount of population, households and employment that are forecast individually for the City of Laguna Hills and for Orange County, and is developed from a "bottoms-up" collaboration of Orange County jurisdictions and the Center for Demographic Research at CSUF. c) OCP-2006 is the only database that has been approved by Orange County jurisdictions to accurately represent the latest available estimates and assumptions for population, land use and employment through Year 2035 in Orange County. d) Adopting an alternate distribution of growth for Orange County contrary to OCP-2006 would fail to represent Orange County and local jurisdiction land use plans, especially in relation to the 14,000 housing units and 16,000 jobs approved in the Ranch Plan Planned Community in South Orange County unincorporated area. For example, SCAG's RTP Policy Growth Forecast significantly reduces the Ranch Plan entitlement, by shifting almost 9,000 households (out of 14,000 residential units) and 11,000 jobs (out of 16,000 jobs) from the Ranch Plan entitlement and shifting these households and jobs to other Orange County locations where such intensification is contrary to local plans, such as in the cities of San Clemente, San Juan Capistrano, and Irvine. The OCP-2006 projections, which were reviewed by major Orange County landowners such as Rancho Mission Viejo and The Irvine Company, appropriately represent the future growth of their landholdings. At present, the only RTP growth forecast that incorporates the OCP-2006 projections is the SCAG RTP Baseline Growth Forecast. e) The Center for Demographic Research at CSU Fullerton, which conducts the Orange County Projection Series, has identified a number of errors with the SCAG RTP Policy Growth Forecast that will require significant correction and amendment to appropriately represent Orange County's future growth as accounted for in OCP-2006. f) Adopting an alternate distribution of growth for Orange County contrary to OCP-2006, and using such an alternate distribution of growth in regional transportation analyses, could significantly distort the transportation needs and transportation capacity of planned Orange County regional improvements, such as the Foothill Transportation Corridor-South (SR-241) extension. g) Any growth forecast database adopted by SCAG as the regional growth forecast is required by State law to be used in county and local transportation models, in compliance with State Government Code 65089(c), which requires consistency in database between the regional SCAG transportation model, county models, and local sub-area models. h) OCP-2006 and its integration into the SCAG RTP Baseline Growth Forecast represent the most likely growth projection for Orange County and should</p>	<p>1 of 2</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Laguna Hills is consistent with the OCP- 2006 as documented in the 2008 RTP Growth Forecast Report. . Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 2</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 15.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					therefore be approved as the SCAG region's growth forecast. As stated above, any adoption of a regional forecast that does not include OCP-2006, would distort the modeling of transportation needs and transportation capacity. In addition to the policy-level comments above, the City of Laguna Hills has specific concerns about the generalized approach exhibited in SCAG's Compass Blueprint 2% Strategy (the basis for the Policy Growth Forecast) of intensifying land uses within ½ mile of transit facilities. Although the City does not oppose the concept of intensifying land uses in those areas around regional transit facilities, the implementation strategy of simply drawing a ½ mile radius around these facilities ignores the realities associated with existing topography and land uses within this radius that are inappropriate and/or infeasible to intensify. For example, the ½ mile radius surrounding the Metrolink Station in the City of Laguna Niguel appears to capture a portion of the Nellie Gail Ranch equestrian community within the City of Laguna Hills. See attached (Year 2035 Difference: SCAG Draft Policy Forecast – OCP 2006 Households) Map. This equestrian neighborhood consists (on average) of one (1) acre residential estates built pre-dominantly on significant hillside slope areas. Not only is this a very low density residential community, but the existing steep slope conditions significantly discourage development on most of the land area. The City would respectfully request that the Nellie Gail Ranch neighborhood be eliminated from the ½ mile radius area surrounding the Metrolink Station in the City of Laguna Niguel.	
08-056	2/19/08	Hack, Bert	Laguna Woods, City of	Letter	<p>It is critical that the 2008 RTP and PEIR be reviewed at all levels of SCAG. The Transportation and Communications Committee (TCC) should be given an opportunity to consider all of the comments provided during the public comment period and staff recommendations before final RTP adoption. Only in this way will the plan receive the thorough vetting it deserves.</p> <p>(The remainder of this comment letter will be addressed in the PEIR.)</p>	<p>Comment Noted. The comment period closed on February 19, 2008. SCAG posted all comments received on the RTP in early March online and notified stakeholders of its availability for download. Also, the TCC were provided a summary of the trends in comments received at their March 3rd meeting for their review and discussion.</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 21.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-057	2/19/08	Rojas, James	Latino Urban Forum	Letter	<p>1 of 3</p> <p>Southern California's growing low-income Latino population mobility patterns rely heavily on non-motorized transportation because of economic reasons. Latinos tend to walk, bike, and use public transit more than any other ethnic/racial group in the region. Latinos also have the highest rates of pedestrian and bike fatalities in the region.</p> <p>On Tuesday February 12, 2008 Latino Urban Forum conducted a meeting with local stakeholders to comment on the Regional Transportation Plan, specifically the Environmental Justice Analysis. Based on this meeting below are comments that should be taken into consideration for the Regional Transportation Plan Environmental Justice Report:</p> <p>1. Overall, stakeholders had a concern that a regional analysis provides blanket statements for equity issues which need to be analysis on a more local level. The EJ Analysis should provide, at the minimum, a county-level analysis of ALL indicators. Providing a regional analysis diminishes and precludes any sort of analysis based on real income and demographics. 2. Recommendation to separate the investments by mode, income and demographics. Possible overlay of the location of major investments and income in those areas. 3. Comment regarding the share of income paid in taxes for higher versus lower incomes. More analysis is needed for the share of taxes paid.</p> <p>2 of 3</p> <p>The Latino Urban Forum recommends the following ideas to improve mobility in low income communities: 1. SCAG should have each jurisdiction develop and adopt a Pedestrian Master Plan because this would insure that the walking needs of the all residents are met. 2. SCAG should have each jurisdiction adopt Complete Street Guidelines, in order to accommodate pedestrian, bike and transit on public right-a-ways. 3. SCAG should make a case for jurisdiction to legalize jitneys and other informal means of transportation.</p> <p>3 of 3</p> <p>4. SCAG should encourage shuttle services provided by big box retailers as part of a transportation demand management.</p> <p>5. SCAG should work with the state, transit agencies and jurisdiction to provide bus shelters and amenities at every bus stop and relocate bus stops that are in front of gas stations</p>	<p>1 of 3</p> <p>The intent of the 2008 RTP Environmental Justice Analysis is to inform transportation decisions so that low-income and minority communities have an opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2008 RTP Environmental Justice Supplemental Report evaluates region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits or burdens various demographic groups are anticipated to experience as a result of the RTP. For a detailed description of the results, please refer to the 2008 RTP Environmental Justice Supplementary Report. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications SCAG will continue to work with stakeholders to address Environmental Justice in the transportation planning process. Note that SCAG's advisory land use policies and strategies included in the Final 2008 RTP, these strategies recommend developing "complete communities" and nodes on transportation corridors, to create more opportunities for walking, bicycling, or using transit.</p> <p>2 of 3</p> <p>Comments Noted. (a) SCAG's Non-motorized Supplemental Report encourages all cities and counties within the SCAG region to develop non-motorized plans and policies for their jurisdiction. (b) The 2008 RTP Non-Motorized Supplemental Report includes a Caltrans policy based on the AASHTO statement. "In 2002, Deputy Directive 64 (DD-64) created a policy which directed Caltrans to 'fully consider the needs of non-motorized travelers (including pedestrian bicyclists and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.'" Chapter 3 of the RTP and in the Non-Motorized Supplemental Report includes recommendations to increase accommodations and planning for bicyclists and pedestrians. (c) The Travel Demand Management section of Chapter 3 of the Regional Transportation Plan mentions strategies that encourage the use of alternatives modes of transportation to the single occupant vehicle.</p> <p>3 of 3</p> <p>Comment noted. SCAG has included a policy in the 2008 RTP to work with operators to ensure connectivity, see Chapter 3 of the RTP and in the 2008 RTP Transit Supplemental Report. Shelter and stop location policies are generally determined by the individual operator and the local jurisdiction.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-058	2/18/08	Kernaghan, Brynn Baird	Long Beach Transit	Email	Long Beach Transit thanks you for the opportunity to comment on the 2008 RTP. We concur in several points in the plan: 1) the need to preserve and maintain our existing transportation assets 2) the goal of merging land use and transportation decisions 3) that particularly for discretionary riders, transit use often depends on service frequency and reliability 4) that additional and stable subsidies for transit are needed, particularly operating funds, and particularly in light of potential reductions in transit funding at all levels due to the economy and state budget proposals. We have a different perspective on two items: 1) It is proposed for SCAG to study how to develop transit service delivery policies to optimize transit service levels. Over the years, this responsibility has resided with the county transportation commissions or equivalent agencies, and due to the variations in transit systems and service areas in the SCAG region, it is suggested that that more localized review is still appropriate. Cross-border studies, such as the current Orange County/LA County study, could provide the needed input for inter-county or connecting service. 2) Again, in looking at fare policies, we have concerns regarding taking a regional approach to setting fares, again due to the unique characteristics in each local area and the responsibility and authority many cities have assumed in establishing their own transit systems. Also, in Los Angeles County, we have recently seen a decline in the proportion of operating cost paid by each passenger with their fare. As referenced above, with decreasing state operating funding and potential loss of sales tax revenues due to the economy, we cannot count on such subsidies to maintain our existing service levels or to increase service to meet demand. So while an increased and stable source of subsidies would be optimum, it does not seem realistic at this time to rely on this or to consider fare-free concepts without an identified new source of revenue to fund them. In our own experience with our fare-free zone downtown, there are major increases in ridership when a free-fare is instituted, but the system must have the funding and capacity to absorb such increased ridership which is a problem in times of reduced revenue from several fronts.	Comment noted. It is SCAG's intent to work in cooperation with Transit Operators to identify optimal strategies to effectively deliver transit services. It is recognized that there is a wide variety of operational solutions to a region this size.
08-059	1/10/08	Edgar, Troy	Los Alamitos, City of	Multiple Signers	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-060	2/11/08	Rudat, David	Los Alamitos, City of	Letter	The City believes the SCAG Growth Policy incorrectly distributes housing and employment growth projections to some areas while not accurately reflecting anticipated growth in other areas. Five examples of discrepancies are listed (see letter). The City recommends that SCAG use the 2006 Orange County Projections in any RTP growth forecast that is adopted. The Baseline growth forecast is the only SCAG forecast that is consistent with the OCP 2006 and which incorporates local input. Furthermore, if the Policy Growth forecast is adopted, it will have significant implications for local government including jeopardizing funding eligibility and risking placing cities in the position of	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Los Alamitos is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					having to amend their general plans to maintain consistency requirements.	
08-061	2/19/08	Le, Dorothy	Los Angeles County Bike Coalition	Letter	<p>The NMT Report is a valuable document that clearly articulates the need for and challenges of improving non-motorized infrastructure and policies in the SCAG region. The recommendations found on P.24 and 25 provide a useful starting point. However, they lack goals and targets that are needed to give better guidance to SCAG members. We strongly recommend SCAG prioritize and fund the Comprehensive Regional Non-Motorized Transportation plan called for in the report as a tool for implementing the report's policies and outcomes. We believe the following recommendations can enhance the NMT Report and SCAG's efforts to expand non-motorized transportation use.</p> <p>1- Need for set goals to guide planning and funding The NMT Report states: "Regionally, non-motorized travel represents 1% - 10% of all trips respectively, but represents less than 0.46% of all transportation funding in the region." It also points out that the California Blueprint for Bicycling and Walking sets goals towards increasing bicycling and walking trips by 50 percent, decreasing bicycle and pedestrian fatality rates by 50 percent by 2010, and increasing funding for bicycle and pedestrian-related programs." In the absence of such targets, it will be difficult for SCAG's regional members to plan appropriately.</p> <p>LACBC's recommendations:</p> <ul style="list-style-type: none"> - The RTP should set performance goals for NMT at least commensurate with the state's Blueprint. - Set funding level goals at least proportionate to trip levels. Encourage County Transportation Commissions (CTCs) to use project scoring criteria that gives priority to projects that integrate bicycle accommodations. 2- Need for Complete Streets policies The NMT Report states there is a total of 1591 miles of class 2 bike lanes in the SCAG region. But, total arterial roadway miles for the region is more than 40,000 miles, and these are the roads where most major destinations are located. This means that less than 5% of these important roads provide accommodation for the safe travel of cyclists. Cities with high levels of bicycle usage typically have upwards of 30% of roads with bike lanes. Many cities and regions are adopting Complete Streets policies that stipulate that all roads must integrate facilities for all road users (which includes pedestrians, cyclists, transit users and the disabled) to the greatest extent possible. The Complete Streets approach has a much better chance of making cycling a viable travel choice than does a bikeway network strategy that focuses on a very limited subset of roads LACBC's recommendations: - Set a goal that will encourage the provision of bicycle accommodation on 30% of arterial roads. - Provide resources, incentives and encouragement for SCAG members to adopt Complete Street policies. 3- Need for local planning 	<p>SCAG is a transportation planning agency, and has no project implementation authority. SCAG's Non-Motorized Supplemental Report encourages all counties and cities within the region to develop non-motorized plans and policies for their jurisdiction. SCAG recognizes that each city has their own unique non-motorized needs, and encourages them to meet those needs under the guidelines listed in the non-motorized chapter. Comments noted. (1) The Non-Motorized Supplement Report includes a Caltrans policy based on the AASHTO statement. "In 2002, Deputy Directive 64 (DD-64) created a policy which directed Caltrans to 'fully consider the needs of non-motorized travelers (including pedestrian bicyclists and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.'" The Draft RTP on page 94 and in the Supplement Report page 25, recommends to increase accommodations and planning for bicyclists and pedestrians. In addition, SCAG's non-motorized supplemental report encourages all cities and counties within the SCAG region to develop non-motorized plans and policies for their jurisdiction. (2) The Safety Supplemental Report in the RTP recommends incorporating complete streets policies - providing safe access for all modes - as fundamental principles of transportation plans. (3) SCAG will consider working with local jurisdictions to assist them in preparation of grant applications. (4) Comments noted. SCAG will consider examining successful (and unsuccessful) strategies from other metropolitan regions to examine their applicability to the SCAG region. (5) SCAG will take this comment under consideration. Please note the RTP describes the performance measures used in Chapter five of the RTP and further in the Performances Measures Supplemental report. (6) Requested correction will be addressed in the Final 2008 RTP.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>resources Currently, many cities do not have the resources to effectively secure funding for NMT planning and projects. Our experience on project review teams has shown us that State Safe Routes to School and Bicycle Transportation Account funding applications from the SCAG region fall short of the quality needed to compete successfully for this funding. LACBC's recommendation: SCAG could make planning resources available to assist cities and counties to more effectively identify and apply for funding for NMT projects. Specifically, SCAG could sponsor a low-cost or no-cost program to provide such assistance throughout the region. 4- Need for better data The SCAG NMT Report correctly identifies the need for better data on walking and cycling trips. Inconclusive data can give an inaccurate picture of the true potential for non-motorized travel to address myriad regional problems. Unfortunately, regional planning and funding decisions seem to be based on this incomplete picture, resulting in very limited efforts to improve non-motorized travel. In contrast, other MPO regions and cities with similar data limitations are choosing to make far more meaningful commitments to NMT planning and funding. Cities like New York and London are making significant investments to NMT. In many cases these investments are paying off handsomely in reduced vehicular travel demand, improved travel choices and other benefits. SCAG needs to investigate what have other MPO regions have done to improve NMT. LACBC's recommendation: SCAG's NMT plan would benefit greatly from a thorough survey of the NMT strategies of other regions and how their investments are paying off. 5- Need to adopt measurements that focus on moving people, not vehicles The NMT Report cites the need to emphasize the fact that the maximization of "opportunities for bicycling and walking, shifts the focus from safely moving the maximum number of passenger vehicles to safely moving the maximum number of people," LACBC's recommendation The RTP should measure performance by evaluating the movement of people rather than passenger cars. 6- Correction: P. 13 Paragraph titled Bicycling "Most local jurisdictions have developed bicycle and pedestrian facilities, NMT or bicycle plans..." etc. Actually, most have NOT done adequate bicycle planning. In LA Co., only a handful of cities have Bicycle Master Plans (BMPS)). Addressing this decided lack of bicycle planning was a primary goal of Metro's current county-wide bicycle plan.</p>	
08-062	2/19/08	Herwick, PhD, AICP, Mark	Los Angeles County, Dept of Regional Planning	Letter	<p>1 of 4 Thank you for the opportunity to review and respond to the SCAG Draft 2008 Regional Transportation Plan, Making the Connections. As the regulating agency for land use in unincorporated Los Angeles County, Department of Regional Planning seeks solutions to transportation and air quality issues through proactive land use management. Through its land use planning DRP strives for coordinated uses that balance local communities' quality of life, open space preservation, and region-wide mobility with commercial vitality and sustainable air quality. Land use strategies are best implemented through locally coordinated planning efforts among land use and transportation planning agencies, which Making the Connections advocates. The Policy</p>	<p>1 of 4 Local jurisdictions were consulted for input regarding growth as part of the forecasting methodology. Local input from Los Angeles County was provided for the 2035 total population, household, and employment growth projections at census tract and city levels by subregions and cities. 2 of 4 Comment noted. Note that the 2008 Final RTP proposes an approximately equal investment in highways and transit over the RTP time frame--see Figure 17 in the Transportation Finance supplemental report.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Growth Alternative, the basis of Making the Connections, which stresses coordination in land use and transportation decision-making, offers strategies for land preservation and mobility that are complementary with the County's Draft General Plan, Planning for Tomorrow's Great Places. The regulation of land use in unincorporated Los Angeles County is conducted by DRP with great care and consideration of transportation and air quality implications and it recognizes the need for close cooperation with transportation planning agencies. The following comments on Making the Connections offered by DRP continue its commitment to collaboration with planning agencies to achieve regionally significant land use and transportation coordination.</p> <p>DRP participated in the Integrated Growth Forecasting process initiated by SCAG following its release of the 2004 RTP and is generally satisfied with the total county population, household and employment projections presented in Making the Connections. However, DRP suggests that SCAG more closely consider locally specific data provided by DRP and city jurisdictions to better reflect local conditions and needs. Attention to these data will help Making the Connections assure that transportation investments are compatible with local infrastructure capacity, housing requirements, and economic forecasts.</p> <p>2 of 4</p> <p>The emphasis of Making the Connections on providing solutions to mobility, population growth, open space preservation, and air quality through coordinated land use and transportation strategies align squarely with the goals and policies of the Los Angeles County Draft General Plan. DRP agrees that the Policy Growth Alternative is a sound foundation for maximizing mobility and achieving air quality conformance. DRP concurs that attention should be paid to in-fill; growth along transit corridors and nodes; jobs/housing balance; accommodation of housing needs due to demographic shift; and preservation of open space. Furthermore, the policies derived from the Compass Blueprint Growth Vision which inform the Policy Growth Vision are a clear guide for influencing sustainable development. However, though Making the Connections advocates a multi-modal approach, there is more emphasis on support and expansion of the highway system and less on transit—a key component of smart growth and a sustainable transportation system. While it is true that making the existing transportation system as efficient as possible can lead to improved mobility and air quality attainment as the Plan 2035 scenario reports on performance measures, reliance on increasing roadway capacity as a primary strategy does little to fundamentally change how mobility is conceptualized. Greater attention to and funding of other approaches (e.g. demand management, pedestrian and bicycle plans, ridesharing) to improving mobility and improving air quality could over time create a system that is far more sustainable and capable of meeting the requirements of AB 32.</p> <p>Making the Connections clearly strives to find innovative solutions to address the conflicting needs of improving mobility while at the same time improving air quality. Lessons from the vanguard of transportation and land use planning are advocated, such as mixed use along corridors, HOV and HOT, but they</p>	<p>3 of 4</p> <p>The selection of an Inland Port facility requires extensive technical analysis of many planning issues and factors, such as goods movement market segmentation (O-D patterns), mode, types of commodities, existing freight system, and land availability etc. SCAG will look into these issues using a comprehensive and integrated approach and will develop a Comprehensive Regional Goods Movement Plan and Implementation Strategy within the next three years.</p> <p>4 of 4</p> <p>Comment noted. Regarding the challenges of AB32 see the 2008 PEIR Greenhouse Gas Emissions analysis and PEIR Appendix B.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>require sufficient funding for full implementation that benefits everyone in the region. DRP supports mixed use, which is a key component of its Draft General Plan. While DRP is looking toward less reliance on the automobile through mixed use, those situations where automobile use is required the HOV and HOT strategies of Making the Connections are certainly worthwhile—if adequately funded.</p> <p>3 of 4</p> <p>DRP is supportive of establishing an inland port in north Los Angeles County and the 2008 RTP proposal for a HOT lane along the high desert corridor would facilitate access to such a port. However, this HOT land should be primarily for goods movement and directly in relationship to an inland port and not as a means for inducing substantial local growth. Furthermore, discussion of the High-Speed Regional Transport (HSRT) system in the 2008 RTP should include an inland port in north Los Angeles County. Such a port, supported by the efficiencies that HSRT could provide, would contribute substantially to the goods movement requirements of the entire SCAG region as it positions itself for economic vitality over the next twenty years. Specifically, DRP recommends that the freight portion of the HSRT be extended beyond Union Station north to Palmdale Airport via the Burbank Airport for an inland port in north Los Angeles County.</p> <p>4 of 4</p> <p>Fully meeting the goals of Making the Connections is contingent on securing the funding for infrastructure enhancements and system management and operations. Additionally, to ensure that the 2008 RTP is robust enough to handle the challenges of AB 32, SCAG must consider more fully additional measures to mitigate the global greenhouse emissions that the system generates. Even the best mobility and air quality performance outcomes of the Policy Growth Alternative will not likely adequately address the requirements of AB 32. Climate change has been raised to a new level of concern and all plans in California must deal with it. DRP feels that SCAG has developed a well documented and thorough RTP that can provide many solutions for mobility and air quality. By providing more focus on strategies such as greater and more diverse transit; pedestrian and bicycle plans; and including an inland port in north Los Angeles County, SCAG could take even greater steps forward improving the entire region's quality of life, economic vitality, and reduction of global greenhouse gases.</p>	
08-063	2/19/08	Afshari, Shari	Los Angeles County, Dept. of Public Works	Letter	<p>As we expand our system to relieve congestion and improve air quality, we must realize that it is equally or more important to maintain and preserve our aging infrastructure. Therefore, we recommend that SCAG designate the perseveration of local streets and roads as a top priority in the RTP and dedicate revenues for this purpose. We are very supportive of the recommendation to maximize the use of our existing transportation system. In particular, we are encouraged by the recommendation to significantly increase funding for arterial improvements and capacity enhancements.</p>	Comment noted.
08-064	1/28/08	Johnson, Roger A.	Los Angeles World	see letter for 08-068	<p>1 of 6: Decentralization of Regional Airport Activity. LAWA supports SCAG's regional</p>	<p>1 of 6 Market incentives assumed for underutilized suburban airports that</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
			Airports (LAWA)		<p>goal to decentralize airport activity. Both limitations to growth at LAX and broader regional roles for ONT and PMD have been incorporated into our planning for the LAWA airport system. However, LAWA is limited in the types of incentives that can be provided to airlines to attract new service. It also cannot be assumed that funds generated at LAX can be made available to attract service to other airports. First, federal regulations limit the use of revenues from airports with existing service towards market incentives for new service at other airports. Second, necessary facility modernization programs over the next 10 years at LAX will limit the resources available to the other airports and each airport will be expected to remain as financially independent as possible. The greatest hurdles for consumer acceptance of regional airport facilities are the cost and availability of service. Therefore, care must be shown in choosing strategies aimed at encouraging passenger growth that might burden airports with increased costs. These costs must then be passed on to airlines and airport tenants and ultimately to passengers, thereby defeating their purpose.</p> <p>2 of 6:</p> <p>The need to integrate land use and transportation planning in our region is very clear. However, the growth forecast used in this RTP goes beyond the current commitments of the member governments to implement the land use concepts that are proposed in the plan. The visionary concepts proposed in the plan are admirable but seem premature. The concern is that in using these forecasts, the plan may have overlooked transportation projects that will be necessary to support land use patterns as the cities and counties general and specific plans now envision. This growth forecast impacts the distribution of regional passenger demand among the airports as well by assuming that population will be more concentrated within an airport's market area. On the other hand, the policy forecast proposes denser population growth inside the urban core of the region~ which is the traditional market area for LAX. This growth pattern supports a more efficient transportation system and reduces transportation investment, but does not support the plans emphasis on decentralizing the airport system. The population living within this core area of the region and particularly within the City of Los Angeles will be the least likely to use the outlying airports. Although the policy growth forecast is highlighted as a key feature of the RTP, it is not clear how the policy forecast contributes to the overall performance of the plan. In designing and testing the scenarios, the preferred growth forecast was paired with the preferred transportation plan while the Baseline 2035 scenario was paired with the baseline growth forecast. Put another way, the ability of the long term constrained transportation projects alone to meet the goals of the plan were not tested.</p> <p>3 of 6:</p> <p>RTIP Project List: RTIP Project LAOF073, "Projects within Los Angeles International Airport to Eliminate Traffic Bottlenecks" (LAWA) (Sec. 336 Funding) was added to the RTIP in Amendment #06-06. This project should be added to the Los Angeles County RTIP Project List, under Local Highway. RTP Project List: All of the RTP HSRT projects are listed as completed in 2020. Given</p>	<p>are designed to promote decentralization include free or low-cost parking, free shuttle service from activity centers, and marketing campaigns to increase consumer awareness of their services. Also, ground access improvements were assumed to increase ground access reliability to airports such as Palmdale with limited ground access route options. Methods of financing these incentives and improvements will be the subject of future SCAG studies including the Regional Airport Management Action Plan. It is acknowledged that strategies for encouraging passenger growth at underutilized regional airports should not burden them with increased costs, but should lower their costs to the extent possible to make them more attractive to airlines and passengers. It should be noted that LAWA currently subsidizes facilities and services at Palmdale Airport to support the introduction of new airline service there.</p> <p>2 of 6</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies.</p> <p>All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>3 of 6</p> <p>The existing 2006 RTIP project LAOF073 will be added to the Final 2008 RTP Project List.</p> <p>4 of 6</p> <p>An HSRT system, although expensive to build, would relieve congestion, provide transportation alternatives, foster development around stations, provide transport for freight. A high-speed transport system would be able to carry hundreds of thousands of passengers in a quick, efficient and environmentally acceptable way.</p> <p>5 of 6</p> <p>1. The High-Speed Regional Transport (HSRT) Business Case, which can be found in the HSRT RTP Supplemental Report assumes that on-airport HSRT facilities such as stations directly serving the airport would be funded by airport revenues, which is permissible under federal law. The Regional Aviation Policies in the Draft 2008 call for more flexible use of airport revenues for off-airport ground access projects than federal law currently permits. It is recognized that the development and operation of regional transportation systems is and will continue to be the broad responsibility of county transportation commissions and transit agencies.</p> <p>2. LAWA staff were involved in the selection of the consultant for SCAG's Regional HOV/Flyaway Study. SCAG aviation staff had several informal communications and one formal coordination meeting with LAWA staff on the study. As the study progresses SCAG staff looks forward to a close relationship with LAWA staff in helping to guide and manage the study including using findings from</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>planning, funding, design, right-of-way and environmental clearance requirements it is unlikely that this project can be in place by 2020.</p> <p>4 of 6:</p> <p>As in previous plans, the 2008 RTP proposes a regional high speed rail system. In this RTP, the extended Initial Operating Segment (IOS) along with a cargo component from the Ports is included as part of the Financially Constrained RTP and the remainder of the system is in the Strategic Plan. The RTP states that surface connectivity between the airports in the region is necessary to achieve the decentralization of airport activity. It envisions the airports functioning as a single airport system with multiple remote terminals. The HSRT in the plan is cited as the basis for a regional airport system and a substantial part of the justification for the HSRT is air passenger ridership. Please note the following comments regarding this element of the plan. LAWA does not agree that it is necessary for a High Speed Rail System to connect airports in order to decentralize the airport system. A rail or transit system that connects population centers to airports would serve the airports as well or better. The idea that connecting passengers would use high speed rail to connect to flights at different airports is attractive; however, it is more likely that airlines will continue to serve connecting passengers at the same airport, hopefully within the same terminal. It is also important to look at the role of connecting passenger traffic in this region. The primary benefit to the region of providing connecting service is to make a broader range of air service available to the region's origin/destination passengers. In terms of economic impact to the region, connecting passengers do not remain in the region long enough and do not spend enough to impact the region's economy to the point where it is worth maintaining a high speed rail system to accommodate them. On the other hand, access to outlying airports via easy, reasonably priced, safe and accessible rail transit from the central population core would make outlying airports more attractive to residents and visitors, the primary customers we are trying to serve at our airports. In addition to the IOS, the plan this year includes a proposed Maglev connection between Anaheim and Ontario International Airport (ONT) as part of a larger system proposed to Ultimately serve Las Vegas. The modeling for the aviation forecasts were completed before the Anaheim to ONT Maglev project was included in the RTP financially constrained projects. This proposed line may have significant potential to provide Orange County air passengers access to ONT and should be included in the RADAM modeling in the future to determine its' utility for serving Orange County air passenger demand. The RADAM model results which include the IOS show that ONT gains only 2.8 MAP in 2035 With the completion of the HSRT IOS, increasing from 28.8 MAP without the rail system to 31.6 MAP with it. This gain actually increases passenger demand at ONT over LAWA's estimated capacity of 30 MAP. At the same time, the HSRT substantially increases passenger demand at San Bernardino International from 3.3 MAP without HSRT to 9.4 MAP with the train. The conclusion is therefore that 6 Million Annual Passengers will be driven by capacity limitations at ONT and LAX to bypass both airports along the same HSRT route to use San Bernardino</p>	<p>LAWA's own analyses of potential new flyaways to serve LAWA airports. The focus of this study is to assess the potential of new flyaways to help decentralize the regional aviation system, including use of single flyways by multiple airports including Bob Hope and John Wayne airports. Any future use of flyways by these non-LAWA airports would imply cost-sharing arrangement to help defray the costs of utilization. 3. The 2035 forecast/capacity constraint for LAX will be revised upward from 78 MAP to 78.9 MAP to reflect the LAX Settlement Agreement. The 2.5 million annual ton (MAT) cargo forecast for LAX in 2035 is consistent with the Aviation Decentralization Strategy that assumes significant cargo growth at underutilized suburban airports, particularly March Inland Port and San Bernardino International airports. It should be noted that the new 2035 cargo forecast for LAX is higher than the 2030 forecast in the 2004 RTP (i.e., 2.3 MAT) despite a marked slowdown in air cargo activity at airports in the region (which is reflected in a significant lowering of the regional air cargo forecast in the Draft 2008 RTP from 8.7 MAT in 2030 to 8.3 MAT in 2035). 4. For Ontario Airport (ONT), the 31.6 MAP physical capacity figure for its two runways was derived by SCAG using the RADAM aviation demand forecasting model that evaluates the interactions between all of the air carrier airports in the region. The difference between this number and LAWA's 28-30 MAP capacity figure for ONT is likely due to the fact that SCAG assumed that San Bernardino International would serve in the future as a short-haul reliever airport for ONT (facilitated by a high-speed rail connection between the two airports), which frees up passenger-serving capacity at ONT using larger aircraft. The 2.0 MAT cargo forecast for ONT is consistent with the Regional Aviation Decentralization Strategy, particularly the assumption that March Inland Port and San Bernardino International would handle significant volumes of cargo by 2035. The loss of El Toro as a potential international airport for the region leaves ONT as the only airport alternative in the region that can provide significant service relief to LAX for international passengers. It is in the interest of all commercial airports in the region to help fund regional transportation strategies that improve access to airports with under utilized capacity such as Ontario and Palmdale. For Palmdale Airport (PMD), SCAG considers the 2030 LAWA forecast for PMD of 1.0 MAP to be extremely conservative. This figure is less than 40% of the 2.6 MAP forecast for PMD in the 2035 Constrained Scenario in the Draft 2008 RTP, which assumes no market incentives and only charter, corporate and short-haul service at PMD. A 1.0 MAP PMD in 2035, which is about what Santa Barbara Airport currently serves, would provide virtually no capacity relief for the regional aviation system. It is based on a relatively simplistic "catchment area" methodology that limits the potential service area of PMD, as opposed to the</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>International for air travel. While it is clear how the model would assign passengers in this manner, are the results truly indicative of how passengers will choose airports in the future?</p> <p>5 of 6:</p> <p>Airport System Funding of Ground Access Improvements: In the Aviation Guiding Principals of the RTP it is stated that the region as a whole has an obligation to help pay the costs of airport environmental mitigation and ground access improvements in counties that serve a disproportionate share of regional air travel demand at their airports. On the other hand it suggests that the airport system pay a substantial amount towards the implementation of the Maglev system. Airports have the responsibility to manage airport facilities and operations and provide efficient links between airport facilities and the ground transportation systems. The development and operation of regional transportation systems is the broad responsibility of the county and the regional transportation and transit agencies. The airports should not be responsible for funding regional transportation. The RTP also proposes changes in the current restrictions on the use of airport funds that would allow the use of airport revenues for off-airport ground access projects. Although LAWA supports change that would allow more flexibility to use airport revenues for projects in the surrounding communities, it has to be recognized that, except for the highways and arterials directly serving the airport, ground access to airports and other primary transportation facilities is a regional issue. Substantial investment is expected in the RTP at LAX, ONT, and PMD to provide capacity and improve facilities to serve regional air service demand. That is the primary role of the airport and the priority for the use of airport revenues whatever the source must first be to fund on-airport, aviation related projects. The Airport Flyaway Program: The RTP states that SCAG has been working closely with LAWA on planning and programming a regional system of FlyAways to serve ONT and PNiD. In fact, the relationship between SCAG and LAWA related to this work is very new, and LAWA has only recently been consulted and advised as to SCAG's project goals and direction. At this time, no alliance or agreement has been crafted between SCAG and LAWA related to FlyAways. LAWA's focus at this time is creating service to LAX to mitigate traffic and environmental impacts created by growth in passenger demand. Service to other airports is being studied. FlyAways are a promising solution to certain ground access problems. However, FlyAways are expensive to operate and require a substantial passenger volume, high fares or significant subsidies to maintain an effective level of service. LAWA has spent a great deal of time and resources carefully studying the feasibility of establishing new FlyAways to serve LAX. Two new locations have joined the Van Nuys FlyAway service in the last few years. However, even for LAX with its extensive market area and passenger base, it has been a challenge to find station locations that meet criteria for financial viability and in most cases LAWA recognizes that a successful service will require subsidy to keep fares low enough and service standards high enough to attract passengers. Although LAWA is studying the potential for FlyAway service to ONT, it must be</p>	<p>much more sophisticated RADAM model methodology that was employed for the Draft 2008 RTP that does not restrict airport service areas to pre-defined catchment areas. The 2035 6.3 MAP forecast for PMD is based on a number of reasonable assumptions. The assumption that there will be increased ground access reliability to Palmdale in the future can be fulfilled by planned completion of the HOV facilities along Rte 14, planned improvements to Rte. 118 to Ventura County to the west, and the planned construction of the High Desert Corridor to Victorville to the east. The assumption that there will be more high-income, high-tech employment in the Antelope Valley/North Los Angeles County is consistent with SCAG demographic forecasts that forecast increased high-tech employment there, mainly related to the aerospace sector. Free shuttle service and low-cost parking at PMD are modest proposals that are consistent with current LAWA programs to subsidize service at PMD that include free parking, terminal rental waivers, revenue guarantees, and free marketing of services. 6. The suggested revisions to the ground access projects for LAWA airports will be made to the Airport Ground Access Element in the RTP, and the RTP Supplemental Report on Aviation and Airport Ground Access.</p> <p>6 of 6</p> <p>The grade separation projects listed in the 2008 RTP and the 2008 RTP Goods Movement Supplemental Report were identified by stakeholder agencies. Completed projects will be identified as such.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>recognized that this may not be the most effective use of limited funds to achieve the goal of increased passenger demand at ONT or PMD. Airport Activity Forecasts: LAX: The capacity constrained forecast for LAX of 78 Million Annual Passengers (MAP) is lower than the 78.9 MAP level allowed by the LAX Master Plan. LAWA does not agree that this number reflects the runway capacity of LAX. The capacity limit for passenger activity in the LAX Master Plan is based on gate capacity. The master plan settlement agreement provides a mechanism for restricting capacity by limiting the number of contact gates available to flights. Based on airfield modeling, the runway capacity of LAX is understood to be higher than 78 MAP. The LAX cargo forecast of 2.5 Million Annual Tons (MAT) in the RTP is also substantially lower than the level of cargo demand anticipated in the LAX Master Plan. The LAX Master Plan anticipates that LAX will serve 3.1 MAT of cargo by 2015. There is no reason to believe that level would be lower by 2035. NT: The RTP assumes an airfield capacity for ONT of 31.6 MAP based on assumed fleet mix and acceptable delay. It should be noted that LAWA's airfield analysis for a NT estimates airfield capacity in terms of passengers at between 28 and 30 MAP. While it is recognized that the airport can support higher levels of activity with higher levels of delay, the ONT Master Plan is being developed to serve about 30 MAP. The RTP forecasts cargo demand at ONT at 1.96 MAT in 2035. By comparison, March Inland Port is forecast to serve 1.1 MAT by 2035. LAWA has forecasted unconstrained cargo demand at ONT to be about 3.26 MAT. This forecast assumes that, out of the outlying airports, ONT will be the first choice of airlines seeking to locate cargo development to serve regional demand. Land use studies conducted as part of the development of the ONT Master Plan have shown that land availability will be a constraint to serving the unconstrained demand. Still, the ONT Master Plan forecast anticipates that ONT can support about 2.9 MAT. We predict that UPS alone will serve about 1.2 MAT by 2030 on their off-airport facility and the Pacific Gateway Cargo Complex now under development is anticipated to serve 715,000 tons of cargo by 2020. In addition to these areas, there is substantial land on the south side of the airport that can be developed for air cargo and will be reserved for cargo in the master plan. The availability of land combined with the location of the airport within the region and the strong presence of logistics services should make . ONT desirable for cargo development as long as land is available. PMD: LAWA has forecasted passenger demand at PMD to be about 1 MAP by 2030. This forecast is based on a study of the airport's traditional market area and surveys done to determine the extent of the service catchment area and propensity to travel by air in the local market. The 6.3 MAP forecast in the RTP is based on a number of assumptions that need to be supported within the growth forecast and other transportation elements of the RTP. These include: Improved ground access reliability: It is assumed that additional access routes will be constructed to decrease the dependence on Route 14 in providing access to PMD. The projects that are assumed should be on the constrained RTP project list and listed in the document. Future Trip Propensities increased: It is assumed that more high income, high tech</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>employment will be present in the Antelope Valley. Is this assumption consistent with the employment forecast used in the RTP? Free shuttle service to airports and Low Cost Parking: The cost for these services needs to be considered in terms of available financial resources to support them. Aviation and Ground Access Report: Please note the following specific comments and corrections related to information in the Aviation and Airport Ground Access Supplemental Report. The Airport Ground Access Element is referred to in the Aviation and Ground Access Report but it is not included in it or as an appendix. The ground access element should be included. On Pg 18 under Item 8. Planned facility and ground access improvements, the following corrections should be made: All projects listed here should refer to projects also listed in the RTIP or RTP and use the same identification number. LAX 1: Widen Sepulveda (Manchester to Lincoln). Although this roadway also serves air passengers, the primary purpose of this project is not specifically to improve airport access. LAX 2/ LAX 4: Upgrade 1105 Off-ramps to Sepulveda. Should be changed to "Widen westbound 1105 off ramp to Northbound Sepulveda" LAX 8: Light Rail or Transit on Century Blvd. Is this referring to the extension of the Green Line to the north? This project is not under construction. LAX 12: No Left Turn Lanes on Aviation/Airport. This project is not planned, programmed or under construction. "New Projects" should be changed to "Planned Projects" LAX 28: Grade Separation on Douglas. This is a City of El Segundo project that is unrelated to LAX ground access. LAX 29: Additional Left Turn Lanes on La Cienega at Centinela: This is a City of Los Angeles Project that is not related to LAX ground access. Delete Tentative Plans bullet - LAX 20/21 Lincoln Blvd: No Project description here. There is some construction on Lincoln at this time. LAX 23: 1-10 HOV Lanes (SR90-1105): Change to 1-405 HOV lanes and add to UnderConstruction portion of the list. LAX 9: Century to Sepulveda: No project description. LAX 17/26: Downgrade by the City of L.A.: No project description. Please add to Planned Projects list: Widening of Aviation Blvd. between 111 th and Imperial Hwy. On Pg. 19 under Item 9: The Tom Bradley International Terminal (TBIT) airside and landside improvements described are not part of the LAX Master Plan. The Flyaway program is no longer planned to provide exclusive access to the internal CTA curb front. On Pg. 22 under Item 8: Reference should be made only to planned and programmed projects that are in the RTIP or proposed in the RTP, Pg. 25 LAWA will be deferring environmental documentation for the PMD Master Plan until projects described in the draft master plan are closer to design and construction.</p> <p>6 of 6:</p> <p>Goods Movement Report: Page 31 of this supplemental report and also Pg. 126 of the main report shows proposed grade separation projects in San Bernardino County. Projects 1 and 17, Grove Avenue and Archibald Avenue both on the Alhambra line are completed projects. Also, on that page, the two grade separation projects at Vineyard should be distinguished in the Project Description List by the rail line they are on.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-065	2/19/08	Beckerman, Jeff	Los Angeles, City of, Demographics Dept.	Public hearing	I think that your document is well thought out. It is presented in a clear manner for those of us who are accustomed to dealing with regional issues. Perhaps just a bit complex for outside folks who may be focused on one or two specific concerns and some sort of cross referenced index may be helpful to direct some to their areas of interest.	SCAG has made available a new RTP brochure completed in February designed to highlight the key challenges within the region, the key projects in the RTP, and the potential funding strategies to pay for those projects. We have created the brochure to be user-friendly and interesting to enhance the reader's appreciation and knowledge as to what is in the plan. The brochure is available at SCAG presentations, in our lobby and online at SCAG's website, www.scag.ca.gov .
08-066	1/24/08	Blumenfeld, Jane	Los Angeles, City of, Department of City Planning	see letter for 08-068	The 2008 RTP Land Use Transportation strategies are similar to the City's smart growth policies adopted by the City Council as part of the City's General Plan. Individual Community Plans contain land use and zoning maps that show the distribution of land uses permitted by category of use and intensity of development in much greater detail than adopted in the General Plan Framework Element. The Community Plans are revised periodically to reflect changed conditions and follow the same approval and adoption process as any other general plan element. DCP is currently revising 12 of the City's 35 community plans. The RTP PEIR recognizes that despite mitigation measures, the land use impacts of the proposed policies and strategies may remain significant. The data provided in both the RTP and PEIR are not sufficiently detailed to evaluate the extent to which individual community plans would meet the requirement of being consistent with the RTP. Furthermore, SCAG has not yet developed a methodology to perform consistency analysis of local general plans with the RTP. Baseline versus Policy Growth Forecast: Out of the 24,056,000 population forecast for the SCAG region for the year 2035, the policy growth forecast allocates 250,000 more people than the baseline growth forecast for Los Angeles County (12 588 vs. 12 338 million respectively). The policy growth forecast focuses on key opportunity areas that could accommodate greater density, such as transit station areas, transit corridors and activity centers, similar to the City's smart growth policies, to achieve greater air quality benefits through reductions in vehicle miles travelled, vehicle hours travelled and delay and increases in transit use. It is reasonable to assume that most of the additional quarter million people assigned by the policy 2035 growth forecast to Los Angeles County would have to reside within the City of Los Angeles. It is however, infeasible to fully assess the potential impact of this growth on the city's infrastructure and services within the timeframe of the RTP comment period. In addition, DCP requests that, in Chapter III, Page 90 of the RTP, the following sentence be deleted because it is inaccurate: "For example, planning around the Exposition Line... had stimulated little TOO." The City does not have a model TOO ordinance.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. Commenter's request has been identified and changes will be reflected in the Final 2008 RTP. In response to the comment on mitigation measures in the 2008 RTP PEIR, see Master Responses No. 2 and No. 4 of Section 3, Final 2008 RTP PEIR Addendum.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-067	2/21/08	Armoudian, Maria	Los Angeles, City of, Dept. of Environmental Affairs	Letter	<p>Thank you for addressing the Southern California Regional Transportation system. As you have noted, the projected population shifts, growth in the goods movement and demand in air travel will likely exasperate an already taxed region's ability to move. Further, we are grateful that you have included in your report the health impacts of our transportation system, which are responsible for 5400 premature deaths annually. It might also be useful to emphasize the transportation sector's greenhouse gas emissions to the region. The EAC think SCAG is right in suggesting a multi-modal transportation that maximizes mobility and accessibility while ensuring safety, security and reliability and protecting the environment. We would also like to ensure the inclusion of the goal to protect public health. We think the plan has important components. We are pleased about the additional rapid bus plan, the decentralization of airports and the high-speed rail. But we would like to see a more ambitious plan in order to meet the demand and the goals of the region.</p> <p>a. Include Bus-only lanes.b.Please revisit the 405 corridor, as it warrants further consideration. c.Please consider including additional "express" routing that is patterned after successful bus plans such as the Flyaway.d.Please explore the possibility of using exiting Cal-Trans right-of-ways along freeways and other such locations to build additional transit lines such as light rail, monorail or bus-only lanes. e.Please consider proposing moratoriums across the region on street widening and expansions and instead invest those funds into improving transit. f.A number of cities have used innovative methods for creating better transit. Perhaps it is useful to explore some of these plans. Some cities that have been noted in the transportation literature include Portland, Oregon; Toronto, Canada; Curitiba, Brazil; Zurich, Switzerland and Copenhagen, Denmark; Surabaya, Indonesia. 2)We recognize that Los Angeles has a "car culture" and that some simple, additional components need to be included in any plan in order to entice people from their cars:a.Park and rides – While there are many deterrents for using existing transit, one ostensible deterrent appears to be inadequate hubs where people can leave their autos near buses, subways or other transit options. b.Additional incentives, such as "ride-for-free" days and other means of reducing the prices of transit (including lobbying for tax incentives). c.Promoting increased telecommuting.d.Create incentives for large employers that successfully implement programs that reduce auto-use (via transit, flex-cars, telecommuting or other means).</p>	Comment noted. Greenhouse gases are further analyzed in the PEIR, see Chapter 3.5 on Energy, 3.2 on Air Quality, and Appendix B on Air Quality. Please note that SCAG encourages compact development in urban areas through its advisory land use policies and strategies.
08-068	2/15/08	Robinson, Rita	Los Angeles, City of, Dept. of Transportation	Letter	<p>1 of 9: The key point is that the City's support for the 2008 RTP should not be taken as support for the implementation of all of the projects included in the RTP. Many of these projects are included in the RTP in order to be eligible for additional federal funding, but will nevertheless require further review and study before the decision to construct and implement. Upon completion of the LRTP, if there is a conflict between the projects or project schedules of the LRTP and the RTP, the City and Metro should request that the RTP be amended to incorporate any necessary changes. As indicated in the attached draft comments to the RTP by Metro, this is the approach recommended by</p>	<p>1 of 9 Comment noted. SCAG continues to work closely with Metro staff to ensure coordination between the Metro Long Range Plan and the 2008 RTP to the extent possible and practical. While Metro has yet to finalize their long range plan, they have provided input in developing the 2008 RTP. Furthermore, there is a mechanism in place that allows for amendment to the RTP should there be a need for one before the next full RTP update.</p> <p>2 of 9 SCAG is not recommending any alternative technology prior to the</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Metro. Support Metro's effort to determine if the RTP financial projections assume new revenues from sources traditionally relied upon by and seek to reconcile the financial projections of the LRTP and the RTP. The City of Los Angeles also reiterates comments from Los Angeles World Airports (LAWA), City Planning Department (DCP), Port of Los Angeles (POLA), and Environmental Affairs Department (EAD). Those comments are found elsewhere in the Draft 2008 RTP comment database.</p> <p>2 of 9: The findings of these, and possibly additional studies, will provide vital information with regard to the preferred approach to high-speed rail systems, both for cargo and passengers. L ADOT recommends that both the City and SCAG wait until these studies have been completed before proceeding to implement HSRT projects.</p> <p>While in the past (2004 RTP) HSRT project(s) were characterized as being privately funded, the 2008 RTP describes these as being "largely self-financed" and that "some level of financial commitment from the public sector" is a "critical component." However, SCAG should be advised that neither the City nor Metro has made any commitment of present or future "traditional" transportation/transit funds to HSRT.</p> <p>3 of 9: The 2008 RTP Aviation Plan relies heavily on HSRT to decentralize aviation demand and to shift aviation demand away from LAX to Ontario and Palmdale airports. For example, the 2008 RTP states that HSRT is an "integral component of the....preferred 2035 regional aviation demand forecast." Because of the City's concerns with HSRT, as described above, the City must reserve judgment on the Aviation Plan at this time. (Please also see attached comments from Los Angeles World Airports.)</p> <p>4 of 9: The City believes it would be useful for SCAG to determine how close to conformity the RTP would be if only RTIP projects were used to reach conformity. If there was a finding that the RTIP projects alone do achieve conformity, then the region would be able to evaluate other projects based upon their transportation and air quality improvement merits without the "pressure" of including these projects in the RTP because of the possibility that they were required for conformity. This would facilitate a more objective cost/benefit analysis of the non-RTIP projects, including HSRT. If it was determined that the RTIP projects alone did not meet conformity, then the region could choose which of the non-RTIP projects to add because there would be a better idea of how much additional emissions reductions were needed to meet conformity. The attached comments from the Environmental Affairs Dept. provide a similar recommendation. The City believes that the HSRT projects should not be used in the modeling for air quality conformity. Although the HSRT projects may have "reasonably available funding," a broad definition that allows inclusion in the RTP, in most cases the funding for HSRT projects could not be described as a "firm commitment." Accordingly, the HSRT projects may not proceed as planned. Therefore, air quality conformity</p>	<p>completion of the Alternatives Analysis study to be completed by June 30, 2008.</p> <p>3 of 9 Comment noted.</p> <p>4 of 9 A) The federal conformity rule requires the regional emissions analysis to include all applicable projects included in the constrained RTP (i.e., all projects coded in the regional transportation model). B) The SCAG TCC policy committee will recommend to the Regional Council the inclusion of projects in the RTP which it deems to meet the financial constraint requirements set forth under federal law and regulations. Accordingly, the regional emissions analysis for the formal conformity finding will properly include all applicable transportation projects included in the constrained RTP. The regional emissions analysis for the formal conformity finding needs to include all applicable projects included in the constrained RTP. As such, the high-speed rail projects included in the constrained RTP are included in the regional emissions analysis.</p> <p>5 of 9 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies.</p> <p>The Baseline Growth Forecast for the City of Los Angeles is consistent with the local input, as documented in the 2008 RTP Growth Forecast Report, provided by subregions and cities within Los Angeles County. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>6 of 9 The "Additional City of Los Angeles RTIP projects" (Pages 1 of 5 to 5 of 5) are either already programmed in the RTIP and included in the RTP Project Listing as such; or have been previously obligated and are no longer part of the adopted RTIP; or are future projects with funding through the Metro 2007 Call for Projects that will be captured through the 2008 RTIP development process based upon input from LA County Metro, which has the responsibility for providing countywide input to the RTP & RTIP. The "Additional Projects for SCAG's RTP/Strategic Plan" projects identified by the City of Los Angeles (Pages 1 to 19) will be incorporated into the RTP Strategic Plan as appropriate.</p> <p>7 of 9 Comment noted. The project information reflects input from LA County Metro and represents the network year for which the project was modeled.</p> <p>8 of 9 Main RTP Document: Comment noted. The project information</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>should not rely on HSRT projects. It should be noted that SCAG, in informal discussions with City staff, has indicated that they do not believe that the HSRT projects are necessary for air quality conformity.</p> <p>5 of 9: The City believes that the 2008 RTP should utilize the Baseline Growth Forecast, which has been generally approved by the City and throughout the region and that it should be clearly stated that Policy Forecast is advisory and voluntary. It should be noted that SCAG, in response to concerns raised from several subregions about the Policy Growth Forecast, has agreed to reconsider which forecast will be used in the RTP. At the March 2008 SCAG Policy Committee meetings, there will be a discussion of whether to use the Baseline or the Policy Growth Forecast in the RTP. SCAG has also confirmed that it appears likely that air quality conformity would be achieved using the Baseline Growth Forecast.</p> <p>6 of 9: [See attachment, PDF pages 38-61, for project listing comments.]</p> <p>7 of 9: Table 3.1 of main document (HOV and HOV Connector Projects): the 1-5/1405 connector has a listed implementation date of 2030; however the Caltrans District 7 2007 HOV Annual Report lists the project completion date as 2016.</p> <p>8 of 9: Los Angeles County TCM's Subject to Timely Implementation Project LA002738 -Change completion date to 2010. Project LAOC8164 -Change completion date to 2010; add note that Exposition Light Rail Construction Authority will be implementing entity. Project LAOB7330 -No comment/changes. Project LAOC8171 -Project cancelled. Project LAOC8173 -Change completion date to 2008; Design complete; bid/advertise phase Project LAOC8209 -Change completion date to 2009; Project in construction. Project LAOC8242 -No comment/changes. Project LA974165 -No comment / changes. Project LAE0566 -LAWA Project. Project LAE0567 -LAWA Project. RTIP Projects. SFV North-South BRT Extension Phase I: Metro Rapid on Reseda & Sepulveda (\$102 million) -If this is the TCRP-designated Valley NorthSouth. BRT Project, available funding is now under \$100 million; add Van Nuys Bl. and San Fernando Rd.Lankershim Bl.; should be combined with other SFV North-South BRT Extension Phases; modify. entry in Table 2 (Major Transit Projects) in Transit Report to reflect full scope of project (page 38). SFV North-South BRT Extension Phase II: Bus Speed Improvements on Metro Rapid Corridors & Park & Ride Facility (\$0) -same comment as for Phase I (page 38). SFV North-South BRT Extension Phase III: Station Accessibility & Ped Enhancements on Reseda, Sepulveda & Lankershim (\$0) • same comment as for Phase I (page 38). SFV North-South BRT Extension Phase IV: Northbound Bus Lane on Sepulveda (\$0) -Note: LA City has not approved bus lanes on Sepulveda. Same comment as for Phase I (page 38). SFV East-West BRT from North Hollywood to Warner Center (\$21 million)- Delete; project completed (page 38). Mid-City Transit Corridor: Wilshire from Vermont to Santa Monica Downtown Wilshire. BRT (\$133 million)- OK, but change from</p>	<p>reflects input from LA County Metro, which has the responsibility for providing countywide input to the RTP & RTIP. TCM's: Project changes such as those referenced here are appropriately considered through the RTIP update process which is based on data input from the CTCs. SCAG has contacted Metro to address the proposed changes. RTIP Projects: Comment noted. The project information reflects input from LA County Metro, which has the responsibility for providing countywide input to the RTP & RTIP. RTP Projects: Comment noted. The project information reflects input from LA County METRO, which has the responsibility for providing countywide input to the RTP & RTIP. Strategic Plan Projects: Referenced Projects will be incorporated into the Strategic Plan Project List as appropriate.</p> <p>9 of 9 Comment noted. Appropriate clarifications will be provided in the TCM Timely Implementation Report, included as part of the Conformity Report Final RTP .</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>"Vermont" to "Western" and modify entry in Table 2 (Major Transit Projects) in Transit Report accordingly (page 38). ADD: Olympic Bl & Mateo St Goods Movement Improvement Phase II -(\$4 million; funded in 2007 Call and entered into FTIP by LADOT). RTP Projects: Canoga Transitway from Warner Center to Chatsworth (\$150 million) • OK; add to Table 3 (Transit Corridor Projects) in Transit Report (page 94), Metro Purple Line Westside Extension from Western to La Cienega, (revise to \$2.3 billion per Metro) (page 94), Strategic Plan Projects, Metro Rapid Bus service expansion in LA City· OK; add to discussion of Strategic Plan in Transit Report (page 198), ADD: East Downtown Truck Access Improvements Phase II -Complete capacity enhancements at four locations in Downtown LA to improve truck access and safety: Olympic Bl. at Alameda St., 16th St. At Central Ave., 14th St. at Alameda St., San Pedro St. at 18th St., ADD: Port Access Improvements -Improve unimproved Lomita Bl. ROW between Wilmington Ave. and Alameda St. to Major Highway Class II standards to provide truck access between intermodal facilities and Alameda Corridor; improve Alameda St. roadway between Henry Ford Ave. and Anaheim St. to Major Highway Class II standards. ADD: Northeast LA Truck Access Improvements -Capacity enhancement on Brazil St. between San Fernando Rd. West and San Fernando Rd. East to reduce truck congestion and gridlock over railroad tracks; capacity enhancement at Main St. and Daly St. to improve truck access between UP/SP railyard and 1-5; install signal on San Fernando Rd. at Tyburn St. To improve truck safety and reduce congestion on San Fernando Rd. (with City of Glendale)</p> <p>9 of 9</p> <p>Transportation Conformity Report: Project ID LAE0566 (expansion of LAX remote terminal flyaway shuttle bus system): project status needs to be modified to reflect the fact that LAWA now operates flyaway shuttles from Union Station (UPT) to LAX and from Westwood to LAX. Project ID LA000274 (Santa Monica Transit Parkway): Project Status should indicate that this project has been completed by the City.</p>	
08-069	2/19/08	Brown, Arthur C.	Los Angeles-San Diego-San Luis Obispo Rail Corridor (LOSSAN)	Letter	<p>Overall, we are disappointed in the lack of inclusion for the LOSSAN Corridor and its passenger rail services, Amtrak's Pacific Surfliner intercity rail service, and Metrolink commuter rail service in the financially constrained plan. It is ironic that the front page of your Executive Summary is a photograph of one of the region's passenger rail stations. The RTP goals include Mobility, Accessibility, Air Quality, Energy, Efficiency, and Linking Land Use and Transportation Decisions. We feel that including alternatives to driving alone such as passenger rail service is key to meeting your goals. Lastly, consider a glossary of terms, including a definition of LOSSAN and a list of transportation agencies of which SCAG is a member such as LOSSAN.</p>	<p>Comment noted. LOSSAN is an inter-regional program of intercity rail. To the extent possible, all near term projects included in the RTP were included in the RTP Baseline assumptions including LOSSAN projects. LOSSAN specific projects beyond the RTP are included in the RTP Strategic element to facilitate inclusion or amendment into the RTP as funding becomes available.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-070	2/15/08	Snoble, Roger	Metro	Letter	<p>1 of 18: In January, the Metro Board was briefed on preliminary recommendations for Metro's draft 2008 L RTP. That briefing included a presentation on our updated financial model, which has been revised to reflect expected increases in project construction costs as well as the impact of the State funding shortfall. SCAG should be aware that Metro does not anticipate adding any new projects in the draft 2008 L RTP, and the schedule of some existing projects may be impacted. Metro's planning staff will coordinate with SCAG planning staff and provide you with our latest financial assumptions, as well as project, cost, and scheduling assumptions.</p> <p>2 of 18: The draft 2008 L RTP identifies various projects that have not been approved by the Metro Board through the 2001 L RTP. We note that Metro anticipates releasing its draft 2008 L RTP in March 2008 and adopting a final 2008 L RTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted L RTP at some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained L RTP to date include the following: I-710 Truck Lanes between ports and SR-60, I-710 Tunnel from I-10 to I-210, High Desert Corridor connecting LA and San Bernardino, I-5 Carpool and Truck Climbing Lanes in Santa Clarita, I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710.</p> <p>3 of 18: The draft 2008 L RTP identifies various projects that have not been approved by the Metro Board through the 2001 L RTP. We note that Metro anticipates releasing its draft 2008 L RTP in March 2008 and adopting a final 2008 L RTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted L RTP at some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained L RTP to date include the following: Regional Connector, Green Line LRT Extension, Gold Line Extension to Montclair, Purple Line Extension to Western and La Cienega</p> <p>4 of 18: The draft 2008 L RTP identifies various projects that have not been approved by the Metro Board through the 2001 L RTP. We note that Metro anticipates releasing its draft 2008 L RTP in March 2008 and adopting a final 2008 L RTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted L RTP at some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained L RTP to date include the following: High Speed Rail System, Orangeline Maglev Project in Southeastern Los Angeles County and Orange County</p> <p>5 of 18:</p>	<p>1 of 18 SCAG staff will continue to work closely with METRO to ensure consistency as appropriate.</p> <p>2 of 18 Comment noted. The additional projects referenced by the commenter are identified as regional priorities in the 2008 RTP and are assumed to be funded with new revenues sources, including tolls and gas tax increases, that may not be considered in Metro's L RTP. SCAG is aware of Metro's schedule for developing its countywide transportation plan and the potential need for a future RTP amendment.</p> <p>3 of 18 Comment noted. SCAG has included a system of new investments in high performance bus and rail transit within the financially constrained RTP that will compliment and expand upon the existing investments. SCAG has also identified additional rail transit projects in the Strategic portion of the plan should more resources become available. Please also refer to the SCAG Non-Motorized section where alternative modes of transportation such as bicycles are discussed.</p> <p>4 of 18 Comment noted. SCAG is aware of Metro's schedule for developing its countywide transportation plan and the potential need for a future RTP amendment.</p> <p>5 of 18 Comment noted. SCAG will continue to work with Metro staff to ensure consistency as appropriate.</p> <p>6 of 18 As stated in the Goods Movement Report, SCAG is exploring methods (including financial incentives) to accelerate implementation of locomotive engine upgrades. We've evaluated potential timeframes and recognize that a 2014 schedule would be most challenging--accordingly, SCAG identifies a 2020 timeframe as potentially feasible for an accelerated engine upgrade schedule.</p> <p>7 of 18 Households and Employment for Los Angeles County overall under 2008 RTP Growth Forecast is projected to decrease about 5.2% and 2.6% respectively from those projected under the 2004 RTP Growth Forecast. Decrease in households and employment in specific corridors noted, to a large extent, reflect this county level decrease compared with the last RTP Growth Forecast. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The baseline growth forecast has been approved as the forecast for the 2008 Regional Transportation Plan. Further, The Baseline Growth Forecast has less intensive development along these corridors,</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>The draft 2008 LRTP identifies various projects that have not been approved by the Metro Board through the 2001 LRTP. We note that Metro anticipates releasing its draft 2008 LRTP in March 2008 and adopting a final 2008 LRTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted LRTP at some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained LRTP to date include the following: Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)</p> <p>6 of 18: Through the review and adoption of the Air Plan, Metro provided comments regarding rail electrification and Tier 4 locomotives, which were assumed to be funded and implemented by 2014. Metro expressed its concern as to whether these programs could be accomplished by that deadline. SCAG should clarify whether these proposals are still included in the draft RTP. We remain concerned that SCAG not commit to these strategies or others, that cannot be realistically be attained on schedule and would be put the region at risk for air quality sanctions and the loss of federal transportation dollars.</p> <p>7 of 18: We have reviewed SCAG's demographic forecast for Los Angeles County and have noted that population and employment is decreasing in comparison to the 2004 RTP, in various corridors where major transit facilities are planned. We are concerned that these reductions are not consistent with SCAG's stated goal to encourage development along transit corridors, and we would seek revisions to growth forecasted for these corridors.</p> <p>8 of 18: We recommend that the RTP section on Transit Operations (page 95-97) be deleted, as service operational policies are the responsibilities of transit operators collectively and individually, rather than related to the regional planning responsibility of SCAG through the RTP. We note that many of the recommendations in this section have already been implemented by Metro in conjunction with Los Angeles County municipal transit operators, and it would be counter-productive to revisit or duplicate programs that are well into implementation. For instance, Metro has just adopted its transit service policies, has implemented its Advanced Passenger Count ITS based passenger data collection system, has implemented an EZ Pass for fare coordination with over 20 Los Angeles County transit operators, is implementing its Transit Access Pass (TAP) universal fare program, and has evaluated ways to improve service efficiency, effectiveness, and connectivity through its Metro Connections effort over the last several years. We do not recommend that SCAG seek FY 08-09 funding for activities listed in the Transit Operations section, as they have been extensively explored and are the responsibilities of the transit operators rather than SCAG. We also note that it is inconsistent to focus on transit operational policies in the RTP, when operational policies are not addressed for highways, arterials, or other modes. Rather than focusing</p>	<p>referenced by the commenter.</p> <p>8 of 18 Comment noted. SCAG has identified a number of policies in the 2008 RTP transit element to work with transit operators to encourage improved bus and rail transit reliability and performance, including efforts to use advanced ITS technologies to better manage transit operations. Metro and a number of Los Angeles County Operators have made significant strides in better coordination and improved efficiency in transit operations. However, significant work will continue to be done to improve transit reliability and connectivity throughout the region. It is SCAG's intent to work with operators to identify key priorities and gaps in this area, identify resource needs, and share lessons learned with other operators. Operational policies are addressed for highways through performance measures and through the ITS element.</p> <p>9 of 18 As part of inter-agency consultation at the Transportation Conformity Working Group (TCWG), staff provided preliminary emissions analysis which did not include high-speed rail projects. At the time the preliminary analysis was prepared and presented to the TCWG, SCAG's TCC policy committee was discussing which projects should be considered in the constrained RTP. Staff discussed at the TCWG meeting and at subsequent TCWG and RTP meetings that the regional emissions analysis for the formal conformity finding needs to include all applicable projects included in the constrained RTP. As such, the high-speed rail projects included in the constrained RTP are included in the regional emissions analysis. In regards to funding, this project as proposed in the plan is expected to be fully funded through the revenue generated from the user fees.</p> <p>10 of 18 Comment noted. The Draft 2008 RTP was based upon project information received from the county transportation commissions. Any new project information provided as part of the public comment period will be incorporated into the RTP. Substitution is required only when a TCM project cannot be delivered or will be significantly delayed. SCAG has worked diligently with the CTCs to ensure TCMs are on schedule or that steps are being taken to overcome implementation obstacles.</p> <p>11 of 18 SCAG staff will continue to work closely with METRO to ensure consistency as appropriate.</p> <p>12 of 18 As explained in the RTP text, the term "Projects in the Pipeline" refers to projects already programmed in the adopted 2006 RTIP. (See p. 97, Draft 2008 RTP) Further, details on the Pipeline HOV projects are included in Exhibit 3.2 and in the RTIP section of the RTP</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>on transit operational issues that are beyond the purview of the RTP, we would encourage SCAG to focus on a very important regional issue which is an impediment to expanding both transit service and transit ridership - the lack of funding for both transit capital and operating needs.</p> <p>9 of 18:</p> <p>It is our understanding that SCAG did not include its MAGLEV proposal in its air quality conformity analysis and that conformity was attained without this project. This is consistent with the 2004 RTP, which listed the MAGLEV in its constrained program but did not assume air quality credit for it. We recommend that this practice be continued for the 2008 RTP. We would also like to see the RTP confirm that this project is fully funded through private funds, and that Metro has no financial obligation.</p> <p>10 of 18:</p> <p>We will work with SCAG staff to ensure that SCAG is aware of our LRTP schedules for Los Angeles County transportation projects. It is important for air quality conformity purposes that the RTP project schedules to be consistent with Metro's project schedules. We need to avoid the need to go through the air quality substitution process to Metro on the Red Line and to OCTA on the Centerline project.</p> <p>11 of 18:</p> <p>Page 13, SCAG states that an additional \$10B is needed for arterial and transit related system preservation needs through 2035 (27 years from now). Metro's latest survey includes an unfunded backlog of \$9.9 B for Los Angeles County for every road and type of system preservation – 3R, Maintenance for Arterials and Local Streets. System preservation needs for arterials are estimated at approximately \$5.4 B for arterials comprised of: \$1.2 B for Arterial 3R unmet backlog, \$2.8 B for annual Arterial 3R unmet cost to maintain backlog for 27 years, \$0.167B of unmet maintenance backlog, \$1.2 B for annual Arterial maintenance Unmet cost to maintain for 27 years, There is another \$4.5B of system preservation needs on local streets (maintenance and 3R)</p> <p>12 of 18:</p> <p>Projects in the Pipeline (p. 97): 5/14 HOV connector will be in construction shortly, and others such as 5/170, 57/60, 405/605, etc. are not even in the strategic element of our LRTP. In addition, I-405 HOV gap closure in the Westside of LA (1st bullet), I-5 and SR-14 (3rd bullet), I-5 and I-605 (4th bullet), I-10 and SR-60 (5th bullet) and US-101 (7th bullet) are all too broad and are in need of better clarification.</p> <p>13 of 18:</p> <p>The RTP references a Major Corridor Study that has been completed for SR-60. Metro is not aware of this Study. The Multi-County Goods Movement Action Plan (MCGMAP) considered preliminary criteria and conducted modeling to identify an East/West freight corridor. The final recommendation of the MCGMAP, however, is that further analysis of parallel East/West corridors needs to take place with consideration given to both alternative technologies and potential East/West non-freeways corridors.</p>	<p>Project Listing. Per Metro's comment, reference to the 5/170 project has been removed from this section of the RTP text, although SCAG has recently received contrary information on this project from Metro programming staff as part of its 2008 RTIP submittal. The 57/60 and 405/605 HOV connectors referenced by the commenter are programmed in the adopted 2006 RTIP.</p> <p>13 of 18</p> <p>The major corridor study referenced in the 2008 RTP is the SR-60 Truck Lane Feasibility Study completed by SCAG in 2001. SCAG recognizes the need for further evaluation of the East-West Corridor and will soon initiate further study to comprehensively look at the regional goods movement system in more depth.</p> <p>14 of 18</p> <p>Comment noted.</p> <p>15 of 18</p> <p>Comment noted.</p> <p>16 of 18</p> <p>Comment noted. The requested change will be made in the Final 2008 RTP, as appropriate.</p> <p>17 of 18</p> <p>Comment noted.</p> <p>18 of 18</p> <p>Comment noted. SCAG is currently studying how to decentralize aviation demand to suburban airports using conventional rail systems (and the regional HOV system) to link a regional system of "flyways" to the suburban airports. Initial modeling indicates though that Metrolink service currently does not have the short headways and frequency of service needed to provide effective ground access to airports such as Ontario.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>14 of 18: Metro is pleased to see SCAG's inclusion of alternative technology methods for moving goods.</p> <p>15 of 18: On page 104, under Transit Strategies, the first sentence of the second paragraph should be revised to read: The goals of public transportation services are to ensure mobility for people without access to automobiles, to provide attractive alternatives for drive-along motorists or discretionary riders, and to promote land use development that relies less heavily on drive-alone automotive access.</p> <p>16 of 18: On page 105, in the Transit Expansion section under "Projects in the Pipeline", the Wilshire Blvd/Mid-City Transit Corridor (Vermont to Santa Monica) in LA County should be renamed as "Wilshire Metro Rapidway in LA County".</p> <p>17 of 18: Table 3.5, Transit Corridor Projects, page 108 the "Purple Line Extension (Wilshire/Western to La Cienega)" should be revised as "Westside Extension (Metro Purple/Red Line Extension)".</p> <p>18 of 18: Aviation Section, pages 108 – 111. The Aviation Decentralization Strategy seems to rely too heavily on the implementation of a very speculative High Speed Regional Transportation (HSRT) system. If such a system is not implemented, there is no backup strategy for getting people to highly decentralized airports.</p> <p>At a minimum, the plan should spend some time describing a more conventional regional rail network that could be developed along existing rail corridors that link the regional airports. Operators such as Metrolink and Amtrak operate along these routes and could provide reasonably direct airport service in the event that the High Speed Regional Transportation System proves to be infeasible.</p>	
08-071	2/14/08	Balian, Habib	Metro Gold Line Foothill Extension Construction Authority	Letter	<p>1 of 2 Expressing appreciation for the inclusion of the Foothill Extension light rail project in the 2008 RTP. Emphasizing the value of the Foothill Extension in relation to its land use impact and forwarding recent documents generated through an FTA TOD Assessment Grant that illustrates the immediate and long-term impacts of the proposed 24-mile light rail system. This information includes analyses and/or current land use status for all cities along the proposed light rail corridor. A summary of public and private investment by each of the corridor Cities is included in the attachment.</p> <p>2 of 2 Emphasizing the value of the Foothill Extension in relation to its land use impact and forwarding recent documents generated through an FTA TOD Assessment Grant that illustrates the immediate and long-term impacts of the proposed 24-mile light rail system. This information includes analyses and/or current land use status for all cities along the proposed light rail corridor. A</p>	<p>1 of 1 Comment noted. Comment noted. Also, please note that the data submitted was incorporated into the Transportation Finance Appendix Report.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					summary of public and private investment by each of the corridor Cities is included in the attachment.	
08-072	2/18/08	Wilberg, Dennis	Mission Viejo, City of	Letter	<p>On behalf of the City of Mission Viejo City Council and the City of Mission Viejo Planning and Transportation Commission, I respectfully submit the following policy-level comments on the Southern California Association of Governments (SCAG) draft 2008 Regional Transportation Plan (RTP), draft 2008 RTP Program EJR, and draft RTP growth forecasts. The SCAG RTP documents were discussed by the City of Mission Viejo City Council at its meeting of February 4, 2008, and by the City of Mission Viejo Planning and Transportation Commission at its meeting of January 28, 2008. The City's comments focus on two key areas: 1) The RTP growth forecast that will be selected for the SCAG region; and, 2) Mitigation measures proposed in the draft RTP EIR. The City of Mission Viejo's policy-level recommendations are as follows:</p> <p>City of Mission Viejo Policy Recommendation that SCAG's adoption of a regional growth forecast for the 2008 RTP shall utilize, for Orange County, the Orange County Projections-2006 (OCP-2006) database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006. At a policy level, the City of Mission Viejo finds that: a) SCAG adoption of a regional growth forecast that incorporates OCP-2006 is consistent with adopted policy directive from the boards of directors of OCCOG and the Orange County Transportation Authority to use OCP-2006 as the basis for Orange County demographics in the 2008 RTP. b) OCP-2006 accurately represents both the distribution and amount of population, households and employment that are forecast individually for the City of Mission Viejo and for Orange County as a whole, having been developed from a "bottoms-up" collaboration of Orange County jurisdictions and the Center for Demographic Research at CSUF. c) Through the "bottoms-up" collaboration and development of OCP-2006, OCP-2006 is the only database that has been approved by Orange County jurisdictions to accurately represent the latest available estimates and assumptions for population, land use and employment through Year 2035 in Orange County. d) The Center for Demographic Research at CSU Fullerton, which conducts the Orange County Projection Series, has identified a series of</p>	The Baseline Growth Forecast for the City of Mission Viejo is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>errors in the SCAG RTP Policy Growth Forecast that will require significant correction and amendment to appropriately represent Orange County's future growth. Orange County's future growth is accurately accounted for in OCP-2006 and is accurately accounted for in the SCAG RTP Baseline Growth Forecast. e) The OCP-2006 projections incorporate the review of Orange County landowners such as Rancho Mission Viejo, and appropriately represent the future growth of Rancho Mission Viejo's landholdings. f) SCAG adoption of an alternate amount and distribution of growth for Orange County, contrary to OCP-2006, would fail to represent Orange County local and General land use plans, especially in relation to the 14,000 housing units and 16,000 jobs approved in the Ranch Plan Planned Community in South Orange County unincorporated area, which borders the City of Mission Viejo. As an example, SCAG's RTP Policy Growth Forecast significantly reduces the Ranch Plan Planned Community entitlement, by shifting almost 9,000 households (out of 14,000 residential units) and 11,000 jobs (out of 16,000 jobs) from the Ranch Plan entitlement. The SCAG Policy Growth Forecast further re-distributes these households and jobs to other Orange County locations where such intensification is contrary to local plans, such as in the cities of San Clemente, San Juan Capistrano and Irvine. g) Any growth forecast database adopted by SCAG as the regional growth forecast is required by State law to be used in county and local transportation models, in compliance with State Government Code 65089(c) which requires consistency in database between the regional SCAG transportation model, county models and local subarea models. SCAG adoption of an alternate amount and distribution of growth for Orange County contrary to OCP-2006, and using such an alternate amount and distribution of growth in regional transportation analyses, could significantly distort the transportation needs and transportation capacity of planned Orange County regional improvements, such as the Foothill Transportation Corridor-South (SR-24 1) extension. h) At present, the only RTP growth forecast that fully incorporates the OCP-2006 projections is the SCAG RTP Baseline Growth Forecast. Based upon the above, the City of Mission Viejo determines that OCP-2006 and its integration into the SCAG RTP Baseline Growth Forecast, represents the most likely growth projection for Orange County. OCP-2006 utilizes information based on local land use, current trends and long-term plans, and represents the most likely pattern and distribution of growth envisioned by local governments and major landowners in Orange County. Thus, the City of Mission Viejo urges that SCAG adopt a 2008 RTP regional growth forecast that utilizes, for Orange County, the OCP-2006 database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-073	2/19/08	Camp, James	National Association of Industrial & Office Properties (NAIOP), So. Cal.	Letter	<p>1 of 6</p> <p>The SoCal Chapter of the National Association of Industrial & Office Properties (NAIOP) provides a unified voice to protect and enhance the commercial real estate industry and quality of life in Southern California. The Regional Transportation Plan, and the Regional Comprehensive Plan, which looks at growth projections in the SCAG region, encourages the incorporation of "integrated land use and demand management", with the goal of developing growth policies that reduce driving. The RTP notes that "SCAG's Compass Blueprint Program, in addition to legislative efforts, shapes the implementation program for enacting these policies and programs..." NAIOP is concerned that the Compass Blueprint Program, implemented and encouraged as a voluntary effort, will actually become mandatory through legislation, currently most notable in SB 375(Lowenthal), which ties Federal transportation funding to city and county adoption of regional plans, such as the RCP. Since the RCP does not reflect the general plans of region counties, or cities within those counties, but on SCAG's concept on how these areas should be developed, the passage of legislation such as SB 375 will effectively mandate that jurisdictional areas deviate from their general plans. The RTP is using the OCP 2006 population projections in one of its concepts. However, SCAG is using another "optional" concept not using OCP projections. NAIOP is concerned that concepts not using OCP 2006 projections would severely impact Orange County transportation plans. We request that only OCP 2006 projections be utilized in the RTP. NAIOP recommends that SCAG consider using a baseline alternative where no further new jurisdictions adopt the Compass Blueprint 2% plan, and one where substantially less than 100% of the future growth is accommodated under Compass Blueprint, but rather through traditional single and multi family developments. This approach provides an impact measurement that is more realistic, especially during the near term.</p> <p>2 of 6</p> <p>The non-governmental groups from which SCAG seeks participation and input (page 40 of the draft RTP) lists the "private sector" as one group at the bottom of the table. While other groups, such as "educational institutions" and "users of bicycle transportation facilities" are important, the builders of housing and commercial and industrial facilities represent a huge stakeholder that is conspicuous by their absence. Cooperation of developers, contractors and other employment groups involved in building are practitioners whose viewpoints and expertise are essential to the success of major components of the RTP, including land use management, construction of communities/facilities and the construction of transportation improvements. These stakeholders should play a larger role in providing input to this process.</p> <p>3 of 6</p> <p>The Integrated Land Use and Demand Management concept is the third set of strategies on the mobility pyramid, focusing on better management of demand on the transportation system through land use policies and encouragement of alternative modes of travel. This strategy relies heavily on the employment of the Compass Blueprint Growth Vision, wherein future</p>	<p>1 of 6</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies.</p> <p>The Baseline Growth Forecast for Orange County is consistent with the OCP- 2006, as in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>2 of 6</p> <p>SCAG has worked diligently over the last 14 months to outreach to all interested parties and encourage their comments on the RTP. We are extremely proud of our efforts to reach out to the private sector, including builders and developers. Of the 250 presentations made, 40 were made to the private sector, including many chambers of commerce throughout the region, the Building Industry Association, the National Association of Industrial and Office Properties, Industry and Commerce Associations and Business Councils.</p> <p>3 of 6</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>4 of 6</p> <p>Comment noted. The 2008 RTP includes the referenced Foothill South extension of SR-241 project, as it is already programmed in the adopted RTIP .</p> <p>5 of 6</p> <p>The RCP describes what could happen if current trends continue, defines a vision for a healthier region, and recommends an Action Plan that could get us there by 2035. The RCP does not provide the projections and methodology outlined in the RTP. There are projections, but the RTP is not based out of the RCP. However, issues such as energy and resources are discussed in the RCP, with an objective to provide an unconstrained plan that will encourage more integrated resource planning.</p> <p>6 of 6</p> <p>Comment noted.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>development is encouraged along transportation corridors and usage of the automobile is dramatically reduced. NAIOP is concerned with two issues that are not adequately explored in the RTP. The first issue is that this concept assumes that alternative modes of travel, primarily rail and bus, will be adequate to service the increased clientele now living in Transit Oriented Developments (TOD) or working in facilities within the transportation corridor. The RTP actually emphasizes the congestion hurdles for rail and bus transit due to track and street demand. The second issue is that the Compass Blueprint concept does not adequately address the economic consequences of increasing the demand for smaller areas of land within the transportation corridors. In particular, if the Compass Blueprint is actually mandated by public policy, the effect will be to artificially create a land monopoly for properties surrounding major transportation centers. Developable land in areas in further outreaches could see their values drop dramatically. This economic dislocation would provide a windfall for some property owners and economic recession for others.</p> <p>4 of 6</p> <p>The Foothill South extension of SR 241 will have a profound effect on Southern Orange County mobility and goods movement. However, if this road is not built the ramifications will also be profound. It is not clear that the RTP takes the elimination of this extension into adequate account, both in terms of direct impacts, but also on alternative transportation options that might be adopted (e.g. widening of the I-5, additional interchange improvements, etc.).</p> <p>5 of 6</p> <p>The RTP is substantially based on the growth projections provided within the Regional Comprehensive Plan and through population projections that make up that plan. There has been no serious challenge, or alternative scenario that envisions a stabilizing or reduction of growth rates in the Southern California counties due to "out-migration", prolonged economic stagnation, unacceptable cost of living and quality of life. There also does not appear to be any serious consideration to the conversion of fossil fuel vehicles to cleaner burning fuels during the 30-year time horizon. Both of these scenarios have some level of validity, especially the conversion of vehicles, simply based on known plans by automakers and legislative mandates from the Federal government. We feel that SCAG should at least address these issues somewhere in their RTP. The RTP encourages the development of "complete communities", wherein can live, work, shop and play. The RTP also encourages planning for additional housing and jobs near transit. However, the plan discourages "dispersed" development in fringe areas. We feel that balanced communities in undeveloped parts of Southern California actually provide a better pressure relief valve than some plans to concentrate and make a development more dense on or near transportation centers. The key is for these developments to be able to provide jobs and housing that balance within the community, effectively reducing the need for residents to make daily commutes to outside job centers. This alternative also minimizes the "land monopoly" effect caused by mandating development within the so-</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>called 2% solution.</p> <p>6 of 6</p> <p>The RTP is making progress in providing more support for dealing with the emerging goods movement crisis. NAIOP encourages SCAG to incorporate as much of the current Multi County Goods Movement Study to date and analysis as possible.</p>	
08-074	2/25/08	Dunn, Lucy	Orange County Business Council	Letter	<p>1 of 3</p> <p>The Business Council would like to provide specific support to three recommendations made by OCTA Board of Directors to the draft 2008 RTP. These policy issues include: High Speed Rail The OCTA Board has serious concerns about the Orangeline Maglev's financial plan, operating scheme, ridership forecasts, ROW assumptions, schedule, technology preference, and level of community support. In particular, the assumption that OCTA-owned ROWs will be made available, at little or no cost, calls the Orangeline's financial plan into question. OCTA expects SCAG to concur with its request to remove the Orangeline from the financially constrained project listing in the final 2008 RTP.</p> <p>2 of 3</p> <p>The Business Council would like to provide specific support to three recommendations made by OCTA Board of Directors to the draft 2008 RTP. These policy issues include: Riverside County to Orange County Corridor The OCTA Board strongly supports further study of both corridors [A and B] in cooperation with RCTC, but believes it is premature to include either project in the constrained plan of the 2008 RTP until feasibility studies are finished and a complete funding plan can be assembled. Moreover, OCTA would like to ensure that OCTA and RCTC remain eligible to continue planning work in this corridor, including ongoing studies of Corridor B, funded with a \$15.8 million federal earmark. OCTA firmly believes that federal regulations permit planning and preliminary environmental studies, such as those being conducted on Corridor B, to proceed before funding for the entire construction cost of a project must be programmed in a constrained RTP. To remain consistent with OCTA's 2006 LRTP, Corridors A and B should be included in the strategic plan of SCAG's 2008 RTP rather than in the constrained plan. OCTA requests that SCAG make that change in the final 2008 RTP.</p> <p>3 of 3</p> <p>The Business Council would like to provide specific support to three recommendations made by OCTA Board of Directors to the draft 2008 RTP. These policy issues include: The baseline forecast should be adopted as the official growth forecast for the 2008 RTP and for air quality modeling purposes because it reflects local input and the most likely growth scenario for OC at the current time. A consistent set of growth projects based on local input is critical for future planning studies, environmental documentation, and</p>	<p>1 of 3</p> <p>Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.</p> <p>2 of 3</p> <p>Comment noted. Based upon consultation with RCTC and OCTA, the construction portion of the CETAP Riverside County to Orange County "Corridor B," connecting Corona and Irvine, has been moved into the Strategic Plan. The RTP Constrained Plan will include only preliminary engineering and environmental work for this corridor.</p> <p>3 of 3</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					transportation modeling efforts. Adopting a dataset other than the baseline forecast could impact funding and environmental approval of future transportation projects. OCTA is concerned with language in the draft 2008 RTP that states, "SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint" (page 91). It is unlikely that OCTA could spend transportation dollars on infrastructure associated with development projects supporting the Compass Blueprint Program. The definition of "specific allowable costs" is unclear, and there is no precedent for OCTA funding such projects. This language should be clarified or removed in the final 2008 RTP. The draft 2008 RTP also states, "SCAG shall use its intergovernmental review process to provide robust review and comment on large development projects and their consistency with the Compass Blueprint" (page 91). Such a process has implications for the timely approval of transportation and development projects under CEQA. This language should be removed from the final 2008 RTP.	
08-075	2/19/08	Wilberg, Dennis	Orange County Council of Governments (OCCOG)	Letter	<p>1 of 2</p> <p>As a preface, it is important to establish that the OCCOG supports the timely adoption of the 2008 RTP. SCAG adoption of the 2008 RTP is essential and critical to enable the Southern California region to proceed forth with the planning, environmental clearance, and delivery of regionally significant transportation projects. Further, OCCOG recognizes that SCAG must approve the 2008 RTP and establish air quality conformity, before the region's current conformity expires on June 7, 2008. The two policy-level comments discussed below, would ensure that the planning of transportation improvements conforms with local plans for growth; and further, that the delivery of transportation improvements be environmentally sensitive yet implement EIR mitigation measures that are reasonable, within the purview of SCAG responsibility, and do not duplicate existing state law. The two policy-level comments endorsed by consensus of the eleven individual members of the OCCOG board are as follows: 1) That SCAG use the Orange County Projections-2006 (OCP-2006) in any adopted growth forecast for the 2008 Regional Transportation Plan, consistent with adopted policy directive from the boards of directors of the Orange County Transportation Authority and the OCCOG. 2) That SCAG remove mitigation measures in the draft 2008 RTP Program EIR that are not related to transportation project delivery and implementation, and remove or revise mitigation measures that impose questionable requirements. (PEIR comments addressed by PEIR staff) Clarifying justification for these two policy-level recommendations are detailed below. SCAG 2008 RTP Growth Forecast Alternatives: 1) That SCAG use the Orange County Projections-2006 (OCP-2006) in any adopted growth forecast for the 2008 Regional Transportation Plan, consistent with adopted policy directive from the boards of directors of the Orange County Transportation Authority and the OCCOG. SCAG has released two alternative growth forecasts for public comment, to be considered for adoption as the regional forecast for the 2008 RTP: A Baseline</p>	<p>1 of 2</p> <p>The Orange County Council of Governments provided comments relating to the use of the policy growth forecast and requesting the use of the OCP-2006 in the adopted growth forecast. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006 as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 2</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 24.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Growth Forecast, which represents the input of SCAG jurisdictions and subregions; and, A Policy Growth Forecast that proposes to re-distribute growth and shift the amount of growth in each SCAG county, to promote growth principles that would intensify future growth near existing transportation facilities and employment areas. The eleven individual members of the OCCOG board of directors opined that: a) Orange County's adopted growth forecast is reflected in Orange County Projections-2006 (OCP-2006), a database of projections of future population, households and employment that was approved by the Orange County Council of Governments Board of Directors on November 30, 2006, and transmitted to SCAG as Orange County's official growth forecast to be used for the 2008 Regional Transportation Plan. OCP-2006 was developed through a "bottoms-up process" with Orange County jurisdictions and major land use owners, and coordinated by the Center for Demographic Research. b) At present, only the RTP Baseline Growth Forecast recognizes Orange County local plans and incorporates the OCP-2006 projections. OCP-2006 is consistent with the RTP Baseline Growth Forecast down to the census tract level. c) In contrast, the RTP Policy Growth Forecast contains significant errors in its representation of Year 2035 planned growth for Orange County, and a listing of the errors in the SCAG Policy Growth Forecast is detailed in a Center for Demographic Research analysis and letter of comment dated February 14, 2008, attached hereto as Exhibit 1 and incorporated herein by this reference. In summary, the CDR analysis in Exhibit 1 identifies that countywide, the Policy Growth Forecast proposes 45,000 more people, 15,000 more households and 9,500 more jobs in Orange County in Year 2035 than OCP-2006 and the RTP Baseline Growth Forecast. Further, the CDR analysis in Exhibit 1 identifies that the Policy Growth Forecast significantly shifts the location of future growth within Orange County, and places future population, households and employment in areas throughout Orange County that are inconsistent with local plans, inconsistent and contrary to approved entitlements and development agreements, and inconsistent with areas designated for historic preservation, open space preservation, and restricted areas of the John Wayne Airport flight path. Any consideration by the SCAG Regional Council to adopt the RTP Policy Growth Forecast as the SCAG regional forecast, must first recognize and implement significant corrections to reconcile all identified errors and inconsistencies identified in Exhibit 1, and use the OCP-2006 database of projections for Orange County as Orange County's forecast. d) Individual Orange County jurisdictions and agencies have also submitted letters of comment identifying errors with the SCAG Policy Growth Forecast and recommending that any adopted growth forecast for the SCAG region incorporate the OCP-2006 projections, which at present, is the RTP Baseline Growth Forecast. Letters of comment received by OCCOG to date from Orange County cities, the Orange County Transportation Authority, and the Transportation Corridor Agencies, are included in Exhibit 2 and incorporated herein by this reference. It should be noted that the letters of comments in Exhibit 2 represent those letters received at the time of this transmittal and</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>that additional letters may be submitted to SCAG by individual Orange County jurisdictions and agencies. e) The use of OCP-2006 as the growth forecast for SCAG's 2008 RTP is a policy directive of the Orange County Council of Governments Board of Directors (November 30, 2006 action) and a policy directive of the Orange County Transportation Authority Board of Directors (November 27, 2006 action). At present, the only 2008 RTP growth forecast that incorporates the OCP-2006 projections and is consistent with OCCOG and OCTA policy directives, is the SCAG 2008 RTP Baseline Growth Forecast. f) Any regional growth forecast adopted by SCAG in conjunction with the 2008 RTP, must demonstrate a realistic consideration of local plans, to ensure that transportation needs and projects correlate with local plans for future growth. At present, the only SCAG RTP growth forecast that demonstrates a realistic consideration of local plans for Orange County, is the RTP Baseline Growth Forecast, which fully incorporates OCP-2006.</p> <p>2 of 2 is a PEIR comment to be addressed by PEIR staff</p>	
08-076	1/30/08	Brotcke, Kurt	Orange County Transportation Authority (OCTA)	Public hearing	<p>1 of 3: I'm here to convey greetings from the OCTA Board on behalf here as well as OCTA staff comments related to the 2008 RTP. First and foremost, we'd like to congratulate SCAG for doing an excellent job on this particular RTP in response to our regional and local meetings in terms of our renewed Measure M program and projects in the RTP. We're appreciative that those projects are in and that we can continue the project development efforts and deliver that multi-billion dollar program project. That particular program brings \$20 billion in nominal revenue to the RTP, and we're thankful that the Orange County voters approved that in November of 2006. We have three major issues to convey to SCAG as part of the 2008 RTP. The first relates to the Orange Line MAGLEV Project that is currently included in the constrained portion of the RTP. Based on board direction on Monday, our board believes that that particular project concept isn't ready for the constrained portion of the RTP, and this request is that it be moved and considered in the strategic portion of the RTP. That really follows from several efforts in the way we view the right-of-way in Orange County, as well as those specific requests from that particular agency or for a variety and other related issues.</p> <p>2 of 3: The second issue relates to the inclusion of the Riverside County and Orange County on corridor and the constrained portion of the RTP. Just as background, we worked with Riverside County and other agencies as part of a multi-county study. We are supportive of continuing to look at that particular corridor. In fact, OCTA has over a billion dollars that we'll be investing in the 91 in the future, and the 91 is our Number 1 freeway project moving forward. As it relates to a new corridor, specifically between Irvine and Corona, we believe that additional feasibility in terms of technical and other studies are</p>	<p>1 of 3 Comment noted. SCAG received the referenced letter from OCTA dated February 4, 2008 addressed to President Ovitt, requesting that SCAG move the Orangeline high speed rail project from the Constrained Plan to the Strategic Plan.</p> <p>2 of 2 Comment noted. Based upon consultation discussions with RCTC and OCTA, the construction portion of the CETAP Riverside County to Orange County "Corridor B," connecting Corona and Irvine, has been moved into the Strategic Plan. The RTP Constrained Plan will include only preliminary engineering and environmental work for this corridor.</p> <p>3 of 3 OCTA provided verbal comments requests to the use of the OCP-2006 as the basis for the 2008 Regional Transportation Plan. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP - 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>necessary, but that goes to the constrained portion of the RTP. So our request of SCAG is that that project, that is the construction portion, be moved to the unconstrained and strategic portion of the RTP. We believe that this approach is really best where the project is right now. We will continue to work with RCT and other agencies in determining the feasibility of that particular project in the future.</p> <p>3 of 3:</p> <p>The third issue relates to the use of demographics in the 2008 RTP. Orange County submitted an OCP 2006 with the 23rd time horizon as a part of the project of this particular RTP. That was not used as a planned RTP, instead Compass 2000 or 2 percent of the solutions used as part of that. We believe a more prudent approach for SCAG would be to use the OCP 2006 as the Orange County demographics for several different reasons. One is that it has been approved by the Orange County Council of Governments. Historically, that's what we provided to SCAG. And then secondly, we don't believe that the 2 percent solution is in alignment with land-use plans, and we always want to use demographics which build on local plans and essentially follow that process and will result in something we can support. Our request of SCAG is that the 2008 RTP, specifically to the constrained portion of the plan, use OCP 2006. Again, I'd like to express my appreciation for SCAG coming here today as well as the inclusion of the renewed revision program and project. Thank you.</p>	

2008 Regional Transportation Plan Comments

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08-077	2/15/08	Leahy, Art	Orange County Transportation Authority (OCTA)	Letter	<p>1 of 6 The OCTA Board has serious concerns about the Orangeline Maglev's financial plan, operating scheme, ridership forecasts, ROW assumptions, schedule, technology preference, and level of community support. In particular, the assumption that OCTA-owned ROWs will be made available, at little or no cost, calls the Orangeline's financial plan into question. OCTA expects SCAG to concur with its request to remove the Orangeline from the financially constrained project listing in the final 2008 RTP.</p> <p>2 of 6 The OCTA Board strongly supports further study of both corridors [A and B] in cooperation with RCTC, but believes it is premature to include either project in the constrained plan of the 2008 RTP until feasibility studies are finished and a complete funding plan can be assembled. Moreover, OCTA would like to ensure that OCTA and RCTC remain eligible to continue planning work in this corridor, including ongoing studies of Corridor B, funded with a \$15.8 million federal earmark. OCTA firmly believes that federal regulations permit planning and preliminary environmental studies, such as those being conducted on Corridor B, to proceed before funding for the entire construction cost of a project must be programmed in a constrained RTP. To remain consistent with OCTA's 2006 LRTP, Corridors A and B should be included in the strategic plan of SCAG's 2008 RTP rather than in the constrained plan. OCTA requests that SCAG make that change in the final 2008 RTP.</p> <p>3 of 6 The baseline forecast should be adopted as the official growth forecast for the 2008 RTP and for air quality modeling purposes because it reflects local input and the most likely growth scenario for OC at the current time. A consistent set of growth projects based on local input is critical for future planning studies, environmental documentation, and transportation modeling efforts. Adopting a dataset other than the baseline forecast could impact funding and environmental approval of future transportation projects. OCTA is concerned with language in the draft 2008 RTP that states, "SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint" (page 91). It is unlikely that OCTA could spend transportation dollars on infrastructure associated with development projects supporting the Compass Blueprint Program. The definition of "specific allowable costs" is unclear, and there is no precedent for OCTA funding such projects. This language should be clarified or removed in the final 2008 RTP. The draft 2008 RTP also states, "SCAG shall use its intergovernmental review process to provide robust review and comment on large development projects and their consistency with the Compass Blueprint" (page 91). Such a process has implications for the timely approval of transportation and development projects under CEQA. This language should be removed from the final 2008 RTP.</p> <p>4 of 6 OCTA has concerns regarding the manner in which SCAG's \$13 billion "Rail</p>	<p>1 of 6 Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.</p> <p>2 of 6 Comment noted. Based upon consultation with RCTC and OCTA, the construction portion of the CETAP Riverside County to Orange County "Corridor B," connecting Corona and Irvine, has been moved into the Strategic Plan. The RTP Constrained Plan will include only preliminary engineering and environmental work for this corridor.</p> <p>3 of 6 The OCTA provided comments requesting the adoption of the baseline growth forecast as the official growth forecast for the 2008 RTP. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. The referenced language on p. 91 of the Draft 2008 RTP has been removed.</p> <p>4 of 6 SCAG recognizes that the proposed Metrolink share of costs would require financial contributions from the county transportation commissions. Accordingly, SCAG's 2008 RTP assumes new sources of revenues to supplement current sources including container fee revenues and federal gas tax adjustments to support some of these initiatives.</p> <p>5 of 6 Comment noted. Detailed information regarding the baseline and policy growth forecasts, including regional emission analysis for each case was presented to the SCAG CEHD policy committee at its March 6, 2008 meeting. The SCAG Regional Council, based on CEHD's recommendation, approved using the Baseline Growth Forecast in the Final 2008 RTP. The conformity analysis in the Final RTP will be based on the adopted Baseline Growth Forecast. See also Master Response 1 regarding the RTP Growth Forecast, Section III, Final RTP PEIR.</p> <p>6 of 6 Comments SCAG will incorporate requested revisions into the Final 2008 RTP Project Listing, the referenced data and project information submitted by OCTA, as appropriate. Note that the dates presented for modeled projects reflects the network year for which a project is modeled, based upon the required regional emissions tests for transportation conformity purposes.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Expansion, Emissions Reduction, and Grade Separation Project” is proposed to be financed. Based on SCAG’s business case for the project, OCTA and other county transportation commissions would be expected to pay a share of the proposed \$1 billion Metrolink revenue bond for rail capacity projects, as well as the associated debt service costs. These expenses are not included in OCTA’s current financial plans. OCTA requests that SCAG develop alternative funding sources to cover the \$1 billion contribution from Metrolink member agencies assumed for this program.</p> <p>5 of 6</p> <p>The baseline forecast should be adopted as the official growth forecast for the 2008 RTP and for air quality modeling purposes because it reflects local input and the most likely growth scenario for OC at the current time. A consistent set of growth projects based on local input is critical for future planning studies, environmental documentation, and transportation modeling efforts. Adopting a dataset other than the baseline forecast could impact funding and environmental approval of future transportation projects.</p> <p>6 of 6</p> <p>Please ensure that SCAG’s Project Listing Report for the final 2008 RTP reflects the revised data submitted by OCTA on Nov 9, 2007, as part of its approved project list for the 2008 RTP (attached). OCTA understand that this data was not incorporated in SCAG’s Project Listing Report for the draft 2008 RTP due to time constraints. Please ensure that any projects submitted by OCTA for inclusion in the 2008 RTIP are appropriately represented in the final 2008 RTP. Also, please be aware that all projects submitted by OCTA for inclusion in the RTIP include costs inflated to YOE; therefore, there is no need to further inflate the costs of these projects within the RTP. Furthermore, please ensure that the costs and completion dates for OCTA projects are consistent with the date OCTA submitted for inclusion in the 2008 RTIP.</p>	
08-078	1/29/08	Pehoushek, Anna	Orange, City of	Letter	<p>The City of Orange has significant concerns about the level and distribution of growth assumed in our community in SCAG’s Policy Growth Forecast. After reviewing the maps provided by both SCAG and the Center for Demographic Research, we have widespread disagreement with the discrepancies between the Orange County Projections (OCP) 2006 and the Policy Growth Forecast pertaining to households and employment. Orange shares in SCAG’s objective of concentrating growth in areas that are now, or in the future could be, transit and employment hubs for the purposes of creating more efficient relationships between land use and transportation; however there are certain community realities that cannot be ignored in the Policy Growth Forecast. During the City’s review of the OCP 2006 data, great efforts were made to arrive at what we reasonably expected to occur in the way of growth in Orange based on our existing and possible future land use policies, level of development activity, and knowledge of our stable single-family residential and industrial areas. In a number of areas, what we now see represented in the Policy Growth Forecast has limited bearing on true conditions in the Orange of today and the future. It should be noted that the City is in the midst</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Orange is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Supplemental Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>of a comprehensive General Plan update, which proposes redesignation of certain historically commercial and industrial areas for different intensity mixed-use districts. In addition to the General Plan update, the City is updating its Santa Fe Depot Specific Plan, which applies to the area around the Orange Metrolink Station and OCTA Transportation Center. The proposed land use plan associated with this update has a transit orientation, but is also highly constrained by the designated historic district that is located within. Both the General Plan and Specific Plan updates consider concentrating new commercial and residential growth in areas of the city that are served by transit are centers of employment. Much like SCAG's objective with the Policy Growth Forecast, the City intends to accommodate future growth and change in a logical way that promotes efficiency between land use and the transportation network. Our review and acceptance of the Center for Demographic Research's OCP 2006 reflects this perspective. This local familiarity, however, has become distorted through SCAG's Policy Growth Forecast. The manipulation of OCP data by SCAG to accommodate the Compass Blueprint Growth Vision results in a future growth distribution scenario for Orange that is inaccurate. Given that the Regional Transportation Plan (RTP) includes Implementation Programs, Strategic Initiatives and monitoring Measures related to implementing Compass Blueprint, the City cannot accept the growth distribution of the Policy Growth Forecast. City staff is in the process of conducting a more detailed review of the RTP in order to provide comments prior to the close of the public review period for that document. Separate from that effort, we would like to provide the following feedback on the materials reviewed at recent Orange County Council of Governments (OCCOG) Technical Advisory Committee Meetings.</p> <p>Employment: As a general comment, the Policy Growth Forecast shows a reduction in jobs from OCP 2006 in some Census tracts through which many of the City's major commercial corridors pass. These include Chapman Avenue, Tustin Street, and Main Street. The city considers these to be relatively stable commercial districts, and does not anticipate job loss over time in these corridors. There are also certain areas of the City that we know to be major employment centers with expanding employment opportunities where the Policy Growth Forecast assumes a lower level of employment than that which was accepted by the City throughout the OCP 2006 process. We would also like to make the following tract-specific comments. Census Tracts 759.01 and 759.02: These two tracts encompass the City's Old Towne Orange Historic District. The historic district is listed on the National Register of Historic Places, and the City has strict development and design standards in place to ensure the long-term protection of historic buildings. Although it contains the Orange Metrolink station and OCTA Transportation Center, and the City is preparing a specific plan update for the area around the station, any future development will be constrained by the extremely limited number of possible redevelopment sites, expectations for the adaptive reuse of historic buildings, and limitations on building heights and densities in order to ensure compatibility of new development with the historic urban fabric. The</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>number of jobs the City accepted in 2035 through the OCP process (191 more than existing) in Old Towne seemed reasonable in consideration of the work on the General Plan and Specific Plan updates. The City strongly objects to the identification of nearly 6,000 more jobs for Old Towne in the Policy and Growth Forecast than what has been projected in the OCP 2006. Census Tracts 758.12: This Census tract consists of an established single-family residential area on the east side of the 55 Freeway, and a mix of strip commercial and multi-family residential development on the west side of the freeway. Therefore, it is unlikely that the 1,012 jobs above and beyond the OCP Projection (additional 33 more than existing) will materialize. Existing development in this area is not expected to change significantly in the future due to size and character of land parcels west of the freeway. Census Tracts 758.13: Because this Census tract is primarily an established single-family residential area, with the exception of limited strip commercial property on the east side of the 55 Freeway, and consists of a mix of strip commercial and multi-family residential development on the west side of the freeway, the City believes that the 1,335 jobs above and beyond the OCP projection (additional 14 more than existing) for 2035 is unrealistic. While intensified commercial development would be possible in the future, it is unlikely to generate the additional jobs identified in the Policy Growth Forecast. Census Tact 760.00: The expanding St. Joseph Hospital and Children's Hospital of Orange County are located in this tract. Both of these hospitals are major medical centers in the region and in the process of implementing of preparing master plans for significant future expansion. The Town and County commercial area is also within this tract. This is an area of the City that is proposed through the pending comprehensive General Plan update to be redesignated from office professional to higher intensity mixed-use land use classification. Furthermore, due to the area's proximity to the hospitals, there is ongoing demand for medical office space in this area, which is expected to result in site redevelopment and job creating in the future. Therefore, we disagree with the Policy Growth Forecast determination that there will be approximately 1,200 fewer jobs in this tract than what the City believes to be possible in 2035 as reflected in OCP 2006 (additional 483 more than existing). Census Tract 761.01: The level of job growth in this Census tract appears high with respect to the City of Orange. Presumably, much of the job growth identified in the Policy Growth Forecast relates to build out of Anaheim's Platinum Triangle area. We would like confirmation of that, particularly given the fact that the Policy Growth Forecast projects over 5,300 more jobs for the tract than accepted by the City in OCP 2006 (additional 27 more than existing). The portion of this tract that is located in Orange is built out of mix of single-family residential, light industrial, and strip commercial development. While some intensification of non-residential uses could occur through redevelopment, it would not support the significant increase identified by SCAG. Census Tract 761.02: This Census tract is home to the expanding UCI Medical Center, major County of Orange criminal justice facilities, high-rise office development, and The Block at Orange. The proposed land use alternatives under consideration</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>as part of the City's comprehensive General Plan update identify this area for a future higher density mixed-use district. This are not only is one of the City's major employment hubs, but is also served by transit with regional bus service as well as bus lineage to the Orange and Anaheim Metrolink stations. It is also easily accessible from both the Interstate 5 and State Route 22 Freeways.</p> <p>Therefore, it is unclear why the Policy Growth Forecast shows nearly 1,000 fewer jobs than the OCP for 2035 (additional 2,526 more than existing).</p> <p>Census Tracts 762.05 and 762.06: While a segment of the Tustin Street and Katella Avenue commercial corridors pas by and through these tracts, this is a largely single family residential area. Therefore, the 2,285 additional numbers of jobs project in the Policy Growth Forecast in relation to those identified in OCP 2006 (additional 201 more than existing) is unlikely. Tracts 758.05, 758.06, 768.07, 758.16, 219.14, 219.18, 219.24: The City is concerned about the job reduction reflected in the Policy Growth Forecast for these tracts. Specifically, Chapman Avenue, one of the City's major commercial corridors, passes through the tracts. While we do not necessarily anticipate significant job growth along this corridor in the future, we also do not expect notable job loss. With respect to Tract 219.24, the City expects recreation-oriented commercial development (e.g., golf resort) in the vicinity of Irvine Lake in the future. Therefore, the City does not believe that a reduction in the number of jobs below that anticipated in the OCP 2006 is appropriate. Households: As a general comment, during the City's review and acceptance of the OCP 2006, careful consideration was given to reviewing the possibility for increasing housing units/households in established single-family neighborhoods through the construction of secondary living units (a.k.a., in-law units or granny flats). Because a significant portion of the City's planning area consists of established residential neighborhoods that are in good condition, and there are very few vacant residential sites available in these s areas, the City does not anticipation any measurable growth or reduction of housing unites. Therefore, the City requests that SCAG honor the OCP 2006 data that was accepted the by the City, and not account for further reductions in the number of housing units in our established residential areas. The only areas where growth can be expected are in East Orange in conjunction with the future construction of approved Irvine Company Project (Tracts 219.12, 219.24 and 524.20) and in areas where the City is considering redesignation of land from commercial or industrial to mixed use (Tract 754.01, 759.01, 759.02, 760.00, 761.02 and 762.04). Of these tracts, 759.01 and 759.02 fall within the Old Towne Historic District and even though infill development is being planned for, it is expected that this will occur in a careful and controlled manner. We would also like to make the following tract-specific comments: Census Tracts 759.01 and 759.02: As noted previously, these two tract encompass the city's National Register listed Old Towne Orange Historic District and are subject to the same constraints related to the development of new housing units as they are to new employment. The number of housing units the City accepted through the OCP process in Old Towne considered the work on the General Plan and Santa Fe Depot Specific Plan updates. Therefore, the City objects to the</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>identification of another 2,500 households projected in the Policy Growth Forecast for 2035 on top of the 114 additional households projected in OCP 2006 for Old Towne. Tracts 758.11 and 758.12: On the east side of the 55 Freeway, these tracts are built out single family residential neighborhoods. West of the freeway, a substantial portion of tract 758.11 is taken up by a large Southern California Edison transmission facility. The remaining area of the two tracts consists of multi-family residential development, a mobile home park, strip commercial and shopping center development. These tracts are not expected or planned to redevelop with significant new residential development. Therefore, the 192 units identified in the Policy Growth Forecast above and beyond those expected in the OCP (additional five (5) more than existing) is unlikely. Census Tract 758.13: As noted above, the City had been considering re-designation of the portion of the Tustin Street corridor passing through this tract for a future mixed-use land use designation. Given that this is no longer the case, and the portion of the tract east of the freeway is an established single-family neighborhood, the 75 additional units anticipated in the Policy Growth Forecast beyond the OCP 2006 data are not likely to materialize. Census Tract 761.01: The City's OCP input reflected a slight increase in the number of housing units in this tract (additional 83 more than existing) by 2035 given the mix of single-family, multi-family, commercial, office, and industrial land use designations in the area. Because the portion of the tract that is within the City of Orange is built out, new housing would occur through redevelopment activity. It is unclear why the Policy Growth Forecast projects 1,124 fewer units than existing conditions, particularly given the City of Anaheim's plans for the Platinum Triangle. Census Tract 761.02: As noted in the comments on employment, this Census tract is expected to experience land use policy changes that would accommodate higher density mixed-use development in the future through the comprehensive General Plan update. Therefore, the City believes that the Policy Growth Forecast should reflect the housing data the City accepted in OCP 2006 (additional 418 more than existing) rather than a reduction in units (222 fewer units than exist today) identified by SCAG. Consistent with the Policy Growth Forecast objectives, the City would like to encourage the development of housing near employment and transportation facilities. As noted above, the area benefits from transit service, freeway proximity, and is a significant employment node. Census Tracts 762.05, 762.06 and 762.08: These tracts encompass a predominantly single-family residential area, as well as commercial properties on Tustin Street and Katella Avenue. Therefore, the additional number of household's projected in the Policy Growth Forecast (1,0005 more than existing) in relation to those identified in OCP 2006 (additional 10 more than existing) is unlikely. Tracts 219.12, 219.24 and 524.20: The City is concerned about the household reduction reflected in the Policy Growth Forecast for these tracts. These tracts encompass an approved approximately 3,900 unit Irvine Company development project. The City is currently processing tract maps for a portion of this development, and has no reason to believe that there will be fewer units constructed than those reflected in the OCP 2006 data. Therefore, we</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					disagree with the Policy Growth Forecast representation of approximately 700 fewer units than what is reflected in the OCP for these tracts.	
08-079	2/19/08	Neely, Timothy	Orange, County of	Letter	<p>Based upon our review, we conclude the Baseline forecast most accurately reflects the projected growth in the unincorporated area; and therefore, the County recommends approval of the Baseline forecast by the Community, Economic and Human Development Committee (CEHD) and the Regional Council for use in the 2008 RTP. This recommendation is supported by the Orange County Transportation Authority (OCTA), the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) and other Orange County agencies whose comments also request the approval of the Baseline forecast, which includes the 2006 Orange County Projections as Orange County's local input, in the 2008 RTP. The County was not provided the opportunity to review and comment on the Policy forecast data for the unincorporated area prior to its release on November 1, 2007 as part of the growth forecast "alternative" for the 2008 RTP. When released, the Policy forecast data was only available at a SCAG TAZ-level and was depicted on a map without jurisdictional, TAZ or census tract boundaries, which made the review of the data difficult because of the lack of consistent boundaries. CDR subsequently created maps utilizing census tract boundaries that were very useful to depict the differences between the Baseline and Policy forecasts, but still did not reflect local jurisdictional boundaries. Jurisdictional boundaries are of concern to the County due to the number of annexations that have occurred over since 2000. The maps created by CDR are based on 2004 boundaries and therefore do not reflect recent annexations. The County will not submit comments on projected growth in areas which are no longer under the County's jurisdiction. County staff overlaid current jurisdictional boundary maps in order to complete its review of the Policy forecast. A review of the Policy forecast map revealed that it appears to be very similar to the "Compass Map/RTP 2035 Test Scenario" produced by SCAG in 2006 for use in the RHNA Pilot Program. The Policy forecast map contains many of the same flaws that were in the 2035 Test Scenario. For example, in TAZs that include both unincorporated area and adjacent cities, there are many instances where the most intense uses and forecasted growth only occur in the unincorporated portion of the TAZ. Also, unrealistic employment growth has been forecasted in areas with little, or no, existing or potential employment opportunities. In other areas, lesser employment has been projected in areas of greater anticipated job growth. Finally, many of the areas with forecasted intense uses are not associated with transportation corridors which SCAG has cited as a central strategy of its Compass Blueprint program. Spreadsheets depicting all inconsistencies between existing uses and proposed uses are attached. Below</p>	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Orange County is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Supplemental Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>are examples of the flaws in the Policy forecast: Census Tract Area Comments regarding the unincorporated portion of the census tract 11.01 La Habra This area is developed with single family homes. There is very little commercial zoned area that cannot accommodate the proposed "city center, main street and office park" uses. 218.17 Yorba Linda There is very little commercial zoned area that cannot accommodate the proposed "activity center and office park" uses. The remaining is built-out as residential. 219.13 El Modena There is very little commercial zoned area that cannot accommodate the proposed "town center, main street and highway commercial" uses. The remaining is built-out as residential and is unlikely to be rezoned to commercial uses. 219.14 Panorama Hill This area is developed with single family homes and is located on land with extreme slopes. There is no commercial zoned land to accommodate the proposed "town center" and the area is inappropriate for higher density uses such as "town residential and city neighborhood."</p> <p>219.17 Orange Park Acres This area contains a long-established rural equestrian neighborhood with larger estate lots. It is unlikely that this area would transition into the proposed high-density "city neighborhood." 320.49 Foothills This area contains extreme slopes and is adjacent to existing rural residential areas and protected open space. It is unlikely that this area would transition into the proposed high-density "city neighborhood." 755.04, 755.06, 756.03, 756.04, 756.06, 757.02, 757.03 North Tustin This area is developed with single-family homes and contains extreme slopes with no areas zoned for commercial uses. This area is not appropriate for more intense and higher density uses and is unlikely to transition to the proposed "town center, office park, main street, city center and city neighborhood" uses. 1100.06 Rossmoor This area is developed with single-family homes with limited commercial zoned area. This area is unlikely to transition to the proposed "city center and town center "uses. 878.06, 879.02, 877.03 West Anaheim This area is developed with single-family homes and contains limited commercial zoned area. This area will not accommodate the proposed increase in employment for "town center, main street, office park, town residential or city neighborhood" development. 320.56, 320.23. Ladera Ranch and Ranch Plan PCProposed employment is less than expected in two planned communities which have been approved and entitled. The number of proposed households is substantially less than approved and entitled. The employment and households expected in these communities are reflected in OCP 2006. 26.10, 755.15 John Wayne Airport - Substantial employment growth has been proposed on the site where John Wayne Airport is located. Substantial household growth has also been proposed in the crash zone for JWA. 524.04 Musick Jail Substantial household growth has been proposed on the site where Musick Jail is located. Relocation of the jail is not anticipated. The Policy forecast is clearly based upon the 2006 "Compass Map/RTP 2035 Test Scenario" which did not accurately depict anticipated growth in the unincorporated area. The Policy forecast does not take into consideration constraints due to land formations, current public facility uses that are unlikely</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					to change, local land use policy or entitlements which have been approved by the Board of Supervisors. However, the Baseline forecast is based upon the 2006 Orange County Projections (OCP 2006) which the County supports as the superior growth forecast for use in the 2008 RTP. OCP 2006 was developed in consultation with local Orange County jurisdictions and accurately reflects the anticipated household and employment growth in the unincorporated area between 2005 and 2035. Therefore, the County recommends that SCAG staff support the Baseline forecast for use in the 2008 RTP.	
08-080	2/19/08	Persaud, Harry	Orange, County of, Dept. of Public Works	Letter	Thank you for the opportunity to review Southern California Association of Governments 2008 Regional Transportation Plan (RTP). The County has reviewed the listing of the projects within the unincorporated area of Orange County and offer the following comments:ORA120504 – La Pata Avenue Widening– Estimated project cost should be changed to \$70,000,000. ORA120507 – Ortega Highway Widening (from 2 – 4 lanes) – Estimated project should be changed to \$74,625,000. e would also like to request the addition of the following projects to the RTIP project list: Moulton Parkway (Via Lomas to Santa Maria) with a cost estimate of \$8,200,000. Moulton Parkway (Santa Maria to El Pacifico) with a cost estimate of \$8,500,000 (Right-of-Way and Construction. Cow Camp Road (Antonio Parkway to Ortega Highway) with a cost estimate of \$94,000.000.	Comment noted. Changes to Orange County RTIP projects will be captured through the 2008 RTIP development process and based upon input from OCTA, which has the responsibility for providing countywide input to the RTP & RTIP.
08-081	1/11/08	Lima, Tony	Orangeline High Speed Maglev	Multiple Signers	We look forward to your continuing support of the Orangeline.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-082	1/10/08	Martinez, Diane J.	Paramount, City of	Letter	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-083	2/14/08	Dock, Frederick	Pasadena, City of, Department of Transportation	Letter	<p>1 of 2: The extension of the Gold Line from its existing terminus in Pasadena to Montclair is an integral component of the infrastructure needed for Pasadena to promote a livable community and encourage non-auto travel. Pasadena continues to actively support the extension of the Gold Line and we support the project's inclusion in the RTP.</p> <p>2 of 2: I believe you are aware of the active role Pasadena has played over a long period regarding any freeway connection that traverses our community. The issue of the freeway gap closure, albeit being a tunnel alternative as opposed to a surface freeway, continues to be a sensitive topic among our elected officials, neighborhood groups and city residents. The upcoming preliminary engineering and technical studies must consider all the routes studied as part of the previous Feasibility Assessment, in addition to any other route that may be deemed practicable as part of the next study. This concept, which is "route neutral", is in conformance with the provision for the SAFETEA-LU technical corrections bill you authored and passed by the House on March 26, 2007. The Draft RTP includes the 710 tunnel gap closure as a toll facility. We request that the RTP recognize the on-going studies for this facility and not presuppose the ongoing studies by defining a route for the 710 gap closure project.</p>	<p>1 of 2 Comment noted.</p> <p>2 of 2 Comment noted. A thorough project specific environmental analysis will be required for the referenced project which will include scoping for alternatives to be considered. Also see 2008 RTP PEIR, Section 3, Master Response No. 2.</p>
08-084	1/29/08	Cartwright, P.E., Kerry M.	Port of Los Angeles, The	see letter for 08-068	<p>Container Fees: The draft 2008 RTP assumes container fees to fund approximately \$42 billion worth of goods movement related highway and freight rail projects. These fees are assumed to be State-imposed (i.e., SB 974), federally-imposed, or from Ports of Long Beach/Los Angeles (Ports) generated fees. The Ports of Long Beach/Los Angeles (Ports) approved a cargo fee on January 14, 2008 to help fund several critical, nationally significant intermodal transportation system projects that are included in the draft 2008 RTP. The projects selected to be partially funded by the Ports Infrastructure Cargo Fee (ICF) are as follows: Gerald Desmond Bridge Replacement (Port of Long Beach), SR-47 Expressway (Alameda Corridor Transportation Authority), Navy Way/Seaside Avenue Interchange (Port of Los Angeles), 1-110 Connectors Program (Port of Los Angeles), South Wilmington Grade Separation (Port of Los Angeles), Ports Rail System (Ports & ACTA). Several critical points of clarification are as follows: 1) the Ports will collect and control the fee proceeds; 2) the fee will be restricted for only the projects listed above, and not for any other project identified in the RTP; 3) the fee will be collected at a specific rate/year as follows (subject to change): \$15/loaded TED in 2009, \$18 in 2010-2011, \$14 in 2012-2014, and \$10 in 2015. The fee will generate approximately \$1.39 billion over seven years, as compared to the \$42 billion assumed in the RTP. Industry's share, estimated to be approximately 47% in aggregate for all of the ICF projects, was computed based upon a detailed nexus analysis and an assumed amount of non-Ports, public funds. The nexus analysis determined the pro-rata share of Ports vehicular and train volumes for all of the designated projects. Additionally, while it is difficult to predict the outcome of SB 974, the Ports remain committed to working with our regional partners in addressing regional intermodal transportation system needs, such</p>	<p>SCAG is aware of the current applications and statewide proposals for container fees; nevertheless, we appreciate your clarification. SCAG will continue to study issues related to market segmentation, intermodal connectivity, warehousing facility needs, port capacity and the inter-relationships between these issues. The newly initiated SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy will provide more insights into these challenging issues.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>as the Alameda Corridor-East Trade Corridor Program. We are still evaluating the Ports ICF for these regional projects, among other options. Furthermore, although it is unclear how the RTP rail fees would be collected, it should be noted that no additional fees will be provided by the Ports ICF or the existing Alameda Corridor Transportation Authority fee, which is solely for debt service for the Alameda Corridor. Two additional points of clarification regarding the assumed SB 974 fees are as follows: 1) SB 974 fees are not presently proposed for highway projects, and 2) half of the fee is proposed for emission reduction projects, not transportation projects. High Speed Regional Transportation (HSRT)-Freight -As noted in the RTP, the Ports are in the midst of conducting a feasibility study of implementing an HSRT/zero emissions container mover system in the Ports area. This study is due to be completed in the first quarter of CY2008. As such, it has not been determined if a system will be constructed in the Ports area. More importantly, the connection from the Ports area to the proposed and referenced segment in the 1-710 corridor will need to be determined via the 1-710 Corridor EIS/EIR. Preparation of this document, along with preliminary engineering commences in February 2008, and will take about three to four years to complete. Another key point of clarification is that the HSRT system is not needed to accommodate the projected Ports Year 2030 throughput of 42.5 million TEUs, which has been incorporated into the RTP baseline. The Ports of Long Beach/Los Angeles have determined that assuming several proposed terminal projects, the Ports can accommodate up to 42.5 million TEUs (which given projected market demand, will be reached sometime between the Year 2020 and 2030). "Business Case: Rail Expansion, Emission Reduction, and Grade Separation": The statement, "...Because the rail capacity investments have the potential to increase throughput for goods shipped through the Ports of Long Beach and Los Angeles, and reduce the need for port investment for additional capacity.." is flawed for the following reason: the Ports estimated terminal capacity is independent of the rail infrastructure, and thus rail capacity improvements outside the Ports do not reduce the need for Port terminal improvements. Inland Ports: Firstly, it is unclear if the "Inland Port" concept is an actual RTP project, or merely recommended for further study. The inland port needs to be studied in more detail than what has been done to date by SCAG. There are many issues to consider and resolve such as: candidate market segments, trucking costs, mainline rail capacity, and pending proposed intermodal facility projects throughout the region. More importantly, inland ports/facilities are not needed to accommodate the projected Ports Year 2030 throughput of 42.5 million TEUs, which has been incorporated into the RTP baseline. The Ports of Long Beach/Los Angeles have determined that assuming several proposed terminal projects, the Ports can accommodate up to 42.5 million TEUs (which given projected market demand, will be reached sometime between the Year 2020 and 2030). It is not currently economically viable to move non-long haul containers via rail to an inland facility. Notwithstanding the economical viability, the railroads will not presently permit these types of short-haul trains on their mainline tracks. Additionally, the number of containers with their first</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					point of rest in the Inland Empire is not a significant amount at this time, based upon detailed origin destination surveys conducted by the Ports of Long Beach/Los Angeles. The inland port concept needs to be studied much more comprehensively and broadly, and involving all entities of the supply chain. Inland port/intermodal facilities are not viable in the near-term or mid-term, but may be viable post-2020, and if the Ports container forecasts exceed 43 million TEUs.	
08-085	2/14/08	Cartwright, P.E., Kerry M.	Port of Los Angeles, The		<p>Modify LA0D390:1) Description - Arterial street and freeway interchange improvements at SR 47 and I-110, and modification to I-110 NM on-off ramps termini at John S. Gibson Blvd. (the nature of this change should not require revisions to the air quality conformity analysis)2) Benefits - Daily traffic delay reductions (2030): 5,174 vehicle hours and 1,423 truck hours; annual emissions reduction (2030): 361 tons/year 3) Cost/Funding - total project cost (\$67.8M); state TCIF request (\$24.7M); identified matching funds (\$4M, \$14.02M, \$23.58M & \$1.5M); match source (SAFETEA-LU, Proposition C, POLB/POLA cargo fees & port revenue) 4) Deliverability - PA/ED (April 2008-June 2009); PS&E (July 2009-June 2010); Construction&ROW (July 2010-April 2013) Modify LA960179:1) Cost/Funding - total project cost (\$61.5M), state TCIF request (\$17M), identified matching funds (\$18.29M & \$25.21M); match source (LA METRO Prop C & POLB/POLA cargo fees) Add the Following project, which is part of the Southern California Consensus Group TCIF requests: 10 SR 47/Navy Way Interchange - \$47.8 M 1) Description - This project eliminates the last traffic signal located on a high-speed State highway that connects I-110 and I-710, via construction of an interchange. both the SR 47 and I-110 are National Highway System routes. The I-110 and SR 47, combined with I-710, carry approximately 30% of all US waterborne container volume (the I-110 alone carries approximately 10%). This program will reduce congestion, emissions and improve safety. 2) Benefits - Daily traffic delay reductions (2030): 1,900 vehicle hours and 144 truck hours; annual emissions reduction (2030): 51.4 tons/year 3) Cost/Funding - total project cost (\$47.8M); state TCIF request (\$20M); identified matching funds (\$27.8M); match source (port revenue/cargo fees) 4) Deliverability - PA/ED (January 2009-2010), PS&E (January 2010-2011), Construction and ROW (July 2010-2013)</p>	Requested revisions will be incorporated into the RTP Project List.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-086	2/19/08	Gutierrez, Ezequial	Public Law Center, The	Letter	<p>1 of 2</p> <p>PLC, on behalf of its client community, strongly urges that SCAG include, as part of its environmental justice policies, that new residential land uses planned around transit stations include affordable housing, as a portion of the overall housing planned around such transit stations. Densification of residential uses around transit stations without including housing which can serve low-income riders results would be irresponsible. The Fruitvale Transit Village Project in the City of Oakland has become a case study that has incorporated EJ principles and included affordable housing units into the residential portion of the TOD project. SCAG is encouraged to study this Bay Area project on various levels ranging from intergovernmental cooperation from federal level to the state level and throughout the Bay Area to design and site planning measures undertaken in the project.</p> <p>2 of 2</p> <p>Low income communities tend to use public transit facilities more often than in the general population. Densification of residential uses around transit stations without including housing which can serve these potential riders results in suboptimal and inefficient use of a public transit system which, on the level of a deliberated public policy and a wise expenditure of public funds, including federal funds which SCAG administers, would be irresponsible.</p>	<p>1 of 2</p> <p>The Fruitvale Transit Village Project in the City of Oakland is applicable to the extent that this development focused on the incorporation of environmental justice principles (e.g. effective use of partnerships; strong commitment to public involvement; etc.) into the planning and design of the Fruitvale Transit Village. As such, SCAG will consider the principles and practices employed in the Fruitvale Transit Village Project in future environmental justice policies. SCAG will continue to work with stakeholders to address Environmental Justice in the transportation planning process.</p> <p>2 of 2</p> <p>Additionally, as part of meeting federal requirements under Title IV of the Civil Rights Act and for conforming to federal Environmental Justice (EJ) principles, policies, and regulations, SCAG has performed an EJ analysis to demonstrate responsiveness to potential imbalances caused by the development of the plans, programs, and policies in the 2008 RTP. The EJ Report provides analysis usage by mode by income and racial/ethnic category.</p>
08-087	2/19/08	Kelly, Dan	Rancho Mission Viejo, City of	Letter	<p>Rancho Mission Viejo wishes to inform you that entitlement was granted in 2004 by the County of Orange for the "Ranch Plan." This entitlement consisted of a General Plan Amendment, Planned Community zoning and a Development Agreement which was entered into by the County of Orange and Rancho Mission Viejo. Further, this entitlement provides for the implementation of the Ranch Plan over a period estimated to be 20-25 years and includes the potential for development of 14,000 dwelling units and up to 5 million sq feet of non residential development. The assumption that any of this entitlement could be reallocated to any other jurisdiction is incorrect, and any attempt to reallocate it would be opposed by Rancho Mission Viejo.</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Rancho Mission Viejo is consistent with the OCP- 2006 as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-088	2/14/08	Farnsworth, Nate	Rancho Santa Margarita, City of	Letter	The City of Rancho Santa Margarita is sending this letter to express concerns related to the growth assumptions within the City in SCAG's Policy Growth Forecast as it relates to the draft Regional Transportation Plan (RTP). Staff has reviewed the maps and data provided by SCAG and the Center for Demographic Research and disagrees with SCAG's results. Since the Policy Growth Forecast is one of the variables used in the RTP, the City believes that these issues need to be addressed prior to the adoption of the RTP. Development in Rancho Santa Margarita began in the 1980s and the City is now essentially built-out. Only a few minor in-fill projects remain within the City. Therefore, major changes in number of households and employment are not expected. Additionally, the City has taken an active role in employment generation and retention and does not anticipate a net loss of any jobs within its commercial establishments. Furthermore, the City has established zoning restrictions that prohibit or restrict specific types of businesses that do not increase the City's employment base. For example, storage facilities and churches are prohibited from the City's Business Park Zoning District and commercial recreation uses, such as dance studios and children's activity centers are restricted within the Business Park. In reviewing the Policy Growth Forecast maps, the City is providing the following comments related to employment and housing broken down by Census Tract: [See attachment for breakdown]	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Rancho Santa Margarita is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.
08-089	2/15/08	Shaw, Jeffrey L.	Redlands, City of	Email	The City of Redlands has reviewed the 2008 Regional Transportation Plan. The City of Redlands appreciates the complexity and enormity of the task at hand and finds that the plan as presented provides vision, policy direction and programs that are in the best interest of the region. The City of Redlands finds that the RTP does incorporate those capital improvement projects which have been supported by SANBAG and the City of Redlands.	Comment noted.
08-090	2/15/08	Medina, Shirley	Riverside County Transportation Commission (RCTC)	Letter	1 of 9 Page 1 – There is discussion that the improvements and additions to the system have not kept pace with the region's increasing population and transportation demand due to rising costs of materials, increased environmental awareness, and community opposition. However, additional factors to rising costs include lack of stable funding, lack of streamlining federal and state project delivery processes, and state and federal laws that lengthen the project delivery cycle. Page 6 – A statement is made that the average speed on an HOV lane is lower than on a mixed flow lane. Is this true for each county? Would like to see the breakout for each county. Page 27 – Delete statement regarding proposed temporary conversion of HOV lanes on Route 60 from full-time to part-time. This project was rejected by FHWA. Page 45 – The document describes the need to preserve right-of-way in laying the groundwork for advancing long-range transportation improvement projects and refers to CETAP as a template for other agencies and jurisdictions seeking to preserve rights-of-way for long-range transportation needs. We appreciate SCAG's reference of the CETAP process. There is additional work needed on identifying long range transportation corridor projects in the Plan. There is also an understanding on behalf of federal agencies and legislators,	1 of 9 A more detailed discussion of project costs and factors leading to rising project costs is included in the Finance section of the 2008 RTP and in the Transportation Finance Supplemental report. The HOV speed referenced by the commenter is a daily average for all HOV facilities in the region. Daily averages include both congested periods and non-congested periods through a 24-hour period, therefore the speeds presented for mixed flow and HOV facilities are essentially equal. This does not suggest that, facility by facility, the HOV speeds are lower than the adjacent mixed-flow speeds. SCAG will delete references to the SR-60 part-time HOV conversion project. According to federal metropolitan planning regulations, only projects included in an adopted and conforming RTP are eligible for federal funds. Recent clarifying guidance from FHWA indicates that projects may initiate EIS efforts for projects that are not included in the RTP, however, FHWA will not give final approval on the EIS until the project is included in the RTP. SCAG supports efforts to streamline project delivery in the region, while maintaining the integrity of the transportation planning and environmental review

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>that if projects are not included in the Plan, then the project may not be eligible for federal funds. The need to clarify the standing of long term projects in the Plan is critical so that these projects can be developed and eligible for all funding sources and for each project phase. There needs to be more flexibility on behalf of the federal agencies to decrease the amount of amendment needed for each project. We recommend that SCAG facilitate discussions with federal agencies, county transportation commissions, and Caltrans to eliminate rules that conflict with the region's ability to deliver projects expeditiously so that the project benefits in the Plan can be realized sooner and at reasonable costs.</p> <p>2 of 9</p> <p>There is no mention of streamlining processes currently required to deliver transportation projects. This should be one of the goals of the plan. There are too many restrictions in the delivery process which prevent projects from being delivered in a reasonable timeframe. Without a concentrated effort to work with federal and state agencies in reducing red-tape, projects will continue to be delayed and costs will continue to increase due to unnecessary "process" delays.</p> <p>3 of 9</p> <p>In general, Goods Movement strategies identified in the Plan need further analysis. For example, inclusion of a high speed freight train at a cost of \$18 billion warrants further review. It is also unclear if the \$18 Billion includes all the grade separation needed to make current rail lines usable for a HSRT system. Regarding electrification of trains, the RTP identifies a significant amount of goods movement via electrification of trains and other modes of transit. However, the Plan does not address the additional power needs to supply all these new modes of transportation. There needs to be more analysis regarding the feasibility of electrifying the rail lines and the institutional framework needed to make this a reality. We suggest this be included in the Strategic Plan so that a funding and implementation plan is developed and adopted by all affected agencies. On page 125, Exhibit 3.13, the Avenue 50 grade crossing has been grade separated and can be removed from this list.</p> <p>4 of 9</p> <p>The Perris Valley Line commuter rail extension is included in the plan and we received notification that President Bush's FY 08/09 budget contains \$50 million for the project with an understanding that the remaining \$25 million will be included in the following year's budget, thus providing the entire federal government commitment of \$75 million for the entire project. This demonstrates a high level of confidence and support of the project from the Federal Transit Administration and should be reflected in the text of the RTP. On pages 3, 105, and 108 of the transit section, please add the following Bus Rapid Transit Service projects for RTA: Magnolia Corridor Phase 1 (city of Riverside), Moreno Valley Corridor Phase 2 (city of Moreno Valley). In addition, on page 13, please change the status of the Metrolink: Perris Valley Line from "planned" to "project development".</p>	<p>processes.</p> <p>2 of 9</p> <p>Comment Noted.</p> <p>3 of 9</p> <p>The HSRT system would not require grade separations as the system would be constructed as a fully elevated system built over existing public rights of way. Comment noted that the goods movement strategies identified in the RTP need further analysis. SCAG has listed the results of a preliminary evaluation of alternative scenarios for rail electrification in Appendix C of the Goods Movement Supplemental Report of the RTP. The study results include estimated electrification costs, appropriate electrification milestones and their durations, and electric power consumption associated with electrified rail for three electrification scenarios. Please note that the rail electrification strategy is not included in SCAG's financially constrained plan. The Avenue 50 grade crossing will be identified as being completed, in the Final RTP.</p> <p>4 of 9</p> <p>Comment noted. Requested changes will be addressed in the Final RTP and the RTP Supplemental Transit Report.</p> <p>5 of 9</p> <p>Comments noted. Page 92, second paragraph under TDM, last sentence will be changed to reflect comment. "Knowledge about current travel conditions on the transportation system can be used by travelers to select among alternatives to driving alone or by avoiding making the trip altogether, which is also known as congestion avoidance." Programming funds towards rideshare programs is a Transportation Control Measure (TCM). By making rideshare programs a TCM, public agencies are demonstrating a commitment to promote and implement rideshare programs throughout the SCAG region. Although private companies and agencies do provide and implement rideshare programs, their level of commitment is not the same due to the fact that public agencies have made rideshare programs a TCM. Thus, by eliminating funds in the RTIP towards rideshare programs, the level of commitment towards these programs will decrease. Will modify The referenced second bullet to reflect the comment will be modified as follows: "Continue to work with county transportation commissions and partners to provide "seamless" intra- and inter-county carpool services to the regional traveler." Will reword the second bullet on page 93 will be reworded to read: "Identify current dedicated funding sources and work with county transportation commissions and partners on identifying additional new funding sources". The referenced Bullet 6 will be changed to read as follows: "Expand the provision for vanpool services in the region through encouraging employers to offer incentives and develop policies that encourage</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>5 of 9</p> <p>RTP Main Document - Page 92, Add to sentence, "Knowledge about current travel conditions on the transportation system can be used by travelers to select among alternatives to driving alone or by avoiding making the trip altogether, which is also known as congestion avoidance." Page 92-93, Under "Increasing Rideshare": Bullet 1: How can programming public funds in the RTIP maintain the public sector share of the existing market and increase carpools? We disagree with this statement and suggest deleting. Bullet 2: Add "Work with county transportation commissions and partners to provide "seamless" intra- and inter-county carpool services....." Bullet 5: How will a dedicated funding source for planning and implementing vanpool programs and services be established? Suggest rewording to: "Identify current dedicated funding sources and work with county transportation commissions and partners on identifying additional new funding sources". Bullets 6 and 7: It is unclear how the expansion of vanpool services will be provided or how staffing and resources will be increased. This proposal needs to be fully vetted with county transportation commissions and partners. Further, how and who will facilitate a regionally coordinated marketing strategy? Need to discuss this proposal with all involved to get buy off. County transportation commissions have already been coordinating and funding such programs.</p> <p>6 of 9</p> <p>TDM Report - Page 1, Second paragraph states that the staying power of soft TDM strategies often fades over time. We disagree with this statement as this is not the case in Riverside County. Suggest rewording or state Riverside County as an exception. Our data indicates that the number of trips reduced in Riverside County increases every year. Page 2, under "Increasing Rideshare", these bullets and the bullets outlined above do not incorporate the current efforts undertaken by county transportation commissions. Therefore, it is unclear if SCAG wants to resurrect their involvement in rideshare as they did a few years ago, or become more involved in current activities. Need clarification. Page 4, examples given under Trip Generation are Telecommuting, web-based retail. Suggest adding "congestion avoidance thru real time traffic data on the web so that commuters understand conditions." Examples under Route Selection include traffic calming and vehicle navigation systems. Suggest adding "real time traffic data on the web so that commuters can understand conditions." Overall discussion on pages 1-4 does not address the marketing strategy of the county transportation commissions, which is to corporate partners. The county transportation commissions market to business and their employees, not end user commuters. This should be reflected in the document. Page 5, under "Scale Congruence", the statement of "But geographic focus of the TDM program and the relatively small share of regional vehicle trips mean that regional congestion levels are unlikely to be affected" seems to undercut the effort of mitigating congestion at local levels, which is still vitally important. Page 8, under "Understanding the Logic of TDM:..." it states that the effectiveness of soft TDM programs tends to diminish over time". However, the State of the Commute report shows a</p>	<p>employers to provide such services." Bullet 7 will be changed to "maintain and sustain a regionally coordinated marketing strategy among the public and private sectors to enhance vanpool programs, increase ridership and improve outreach efforts."</p> <p>6 of 9</p> <p>Page 1 comment: Reword sentence to "... the staying power of soft TDM strategies can fade over time."</p> <p>Page 2 comment: Comment noted. Bullet 5 "Establish a dedicated funding source..." will be deleted. Bullet 6 will be changed to read "Expand the provision for vanpool services in the region through encouraging employers to offer incentives and policies that encourage employers to provide such services." Bullet 7 will be changed to "maintain and sustain a regionally coordinated marketing strategy among the public and private sectors to enhance vanpool programs, increase ridership and improve outreach efforts."</p> <p>Page 4 comment: Add "congestion avoidance thru real time traffic data on the web so that commuters understand conditions." under both Trip Generation and Mode Choice.</p> <p>Page 5 and Page 8 comments: Comment noted. The issue is latent demand, and is discussed further on page 8 with the example of HOV lanes.</p> <p>Page 10 comment: Comment noted.</p> <p>Page 12 comment: Comment noted. The sentence on page 12 indicates that carpooling has declined nationally.</p> <p>7 of 9</p> <p>Comment noted. Language will be added to the referenced policy regarding ITS, to indicate that this effort needs to be coordinated with the county transportation commissions, Caltrans, and other agencies implementing ITS systems.</p> <p>8 of 9</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies.</p> <p>The Baseline Growth Forecast for Riverside County is consistent with the 2006 RCP, as documented in the 2008 RTP Growth Forecast Report, provided by the Riverside County Transportation and Land Management Agency (RCTLMA). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>9 of 9</p> <p>SCAG recognizes that the RCTC Board currently has not taken action on the issuance of revenue bonds to support the CETAP project. However, SCAG assumes that appropriate actions by the Board will need to occur to ensure the CETAP project completion as scheduled. The 2008 RTP specifically notes that the issuance of debt is subject to RCTC Board policy.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>different result for Riverside County. Overall discussion tends to downplay importance of TDM soft programs. Suggest adding language that addresses the need for soft and hard programs, and that regions vary and need a “tool box” containing both sets of strategies to support the different needs of the different regions. Page 10, there is no mention of the “State of the Commute Report”, which provides a more positive light on TDM. Need to incorporate State of the Commute report in this section. Currently, sending mixed messages with the commute report more positive then the RTP TDM section. Page 12, there is a statement that says that “carpooling has declined over the past decade.....” Again, this is not true in Riverside County, which is also indicated in the “State of the Commute”.</p> <p>7 of 9</p> <p>ITS Report - Page 3, RCTC supports the recommended policies and actions for ITS. The third policy/action that states “Identify funding sources to assure that transportation system operations are funded”, it is suggested to add language indicating that this effort needs to be coordinated with the county transportation commissions, Caltrans, and other agencies implementing ITS systems.</p> <p>8 of 9</p> <p>Executive Summary</p> <p>Page 13, Integrated Land Use - Since SCAG does not have any land use authority greater emphasis needs to be placed on educating local officials and the public on the need to change current land use policies in order for the strategies to be implemented.</p> <p>The Policy Growth Forecast needs to be revisited to ensure that the Compass Strategies developed by local agencies have been incorporated into the Policy Growth Forecast. The Compass Strategies identify high density and transit oriented development so that trip lengths are reduced, which benefit inland counties. The Policy Growth Forecast should reflect a balance in the number of additional households required for each county (by income type) and the number of jobs in each county.</p> <p>9 of 9</p> <p>Support the finance mechanisms identified in the RTP Financial Plan, including those identified for long-range projects such as CETAP, and our proposed toll facilities on I-15 and SR 91. However, we ask that the revenue source of Riverside County Measure A (Bond Anticipation Notes) be removed until such time our long range plan includes this source of revenue.</p>	
08-091	2/19/08	Wahba, David	Rolling Hills Estates, City of	Letter	<p>Purpose of this letter is to further analyze the City population estimates and projections that we discussed on a previous conversation. The City would like to confirm its population estimates and projections to ensure that population associated with approved and proposed housing units in the City will result in a population increase that is substantially consistent with the population estimated and projected by SCAG.</p>	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-092	2/19/08	Squire, Jim	San Bernardino County	Letter	<p>1 of 4 Comments on formatting and word choice Pages 9 and 10: The subsections of text in the Executive Summary entitled “Aging Infrastructure” and “Explosive Growth in Goods Movement” are repeated word-for-word on pages 66 and 67 in Section II of the document. This could be truly “summarized” and shorten the Executive Summary: Page 18, first column, lines 8-12 Add an “s” to “it.” Change sentence to read: “SCAG is also working with the newly-reactivated Southern California Regional Airport Authority (SCRAA) in its ongoing efforts to restructure and redefine its mission, with the focus of helping to implement the Regional Aviation Decentralization Strategy through facilitating key airport ground access improvements.” Page 28, first column, and page 173, second column Update language relative to ARB’s “plans to release the early action plans for public review in mid-December 2007 for adoption in January 2008” since we are already past those dates. Page 28, first column. The last sentence of the first paragraph under “Environmental Justice” and the first sentence of the next paragraph are almost identical. Combine the two to make it more readable. Page 44, first column, last paragraph, first sentence Add an “s” to “constraint.” Change sentence to read: “Finally, while recognizing financial constraints, the Plan puts forth a suite of new and innovative funding strategies that are realistic, practical, and achievable within the time frame of the Plan.”</p> <p>Page 51, first column, last paragraph, fourth sentence Delete “been.” Change sentence to read: After adjusting for inflation, per capita income of the region has declined from 1999 to 2006 (-5.7%). Page 52, Figure 2.6 It would help readability of the graph to add the amounts above each column. Page 65, first column, first paragraph under “Growing, But Still Modest Public Transit Usage” Add the word “million” after “622.” Change sentence to read: “Between 2000 and 2005, regional transit use increased by more than 16 percent, from 622 million annual unlinked passenger trips to more than 722 million , as shown in Figure 2.10.” Page 106 and 107: Legends on Figures 3.5 and 3.6 (and similar maps) are too small.</p> <p>2 of 4 Security: Pages 78, 87, 94: The policies listed in “Transportation Security” section are not in the same format (numbered vs. bulleted) as the policies listed on page 87 but they are similar to those on page 94. It would be helpful and would increase readability to display policy in the same manner for all sections. Security Pages 79, first column: Policies 5 and 6 are almost identical. Can they be combined?</p> <p>3 of 4 Goods Movement: Pages 122: Should the BNSF third main line project for the Cajon subdivision be added to the map?</p> <p>4 of 4 Mitigation Measures: Pages 72, first column, first paragraph and Figure 2.13: Data for 2004 Greenhouse Gas Emissions is available. The figure and associated text in the first column could be updated to more current</p>	<p>1 of 4 Comments noted, and requested changes will be made in the Final 2008 RTP where appropriate.</p> <p>2 of 4 The referenced sections of the Security Supplemental Report will be modified to have greater consistency in the bullet format (numbered versus bullets) and the two identical policies noted by commenter, will be combined.</p> <p>3 of 4 This project is currently included in Exhibit 3-10.</p> <p>4 of 4 1. The California Air Resources Board approved a 2020 emissions limit of 427 million metric tonnes of CO2 equivalent in December 2007. The referenced Figure 2.13 will be updated according to the most recent greenhouse gas emissions inventory. 2. A reference to the State Alternative Fuels Plan is provided on page 72. Additional information has been added to reflect its current status. 3. A brief explanation was added to describe parking cash-outs on page 131 4. Additional discussion of the CARB’s discrete early action items was added to page 72, where a discussion of the low carbon fuel standard, one of the discrete early action items, already existed. 5. The grammatical edit was incorporated on page 132 6. The reference to some cities not having a General Plan has been removed on page 133 since General Plans are required of all cities in California as noted by the commenter. 7. A brief definition of geologic unit was added on page 135. 8. The grammatical edit was incorporated on page 137.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					information. Pages 131, first column: Should a reference to the State Alternative Fuels Plan be added to the second paragraph? Pages 131, second column: Add a brief explanation for a “parking cash-out” to the second bullet or some place that makes sense? Pages 132, first column: Add a comma after “programs” in the first line of the “Air Quality and Climate Change” section. Also, perhaps add a reference to the State ARB’s “early action measures to reduce greenhouse gas emissions: in this section. Pages 133, first column: In the first paragraph under “Land Use” the plan states, “. . . nor do all cities have general plans.” Is this correct? I thought state law required all jurisdictions to have a general plan. Pages 135, first column: In the first sentence under “Geology, Soils, and Seismicity” the term “geologic unit” is used. A definition should be included to make it more readable for those who are unfamiliar with the term. Pages 137, first column: The third sentence under “Noise” starts out with “Impacts to noise” The impacts are not to noise but to the public from noise.	
08-093	2/19/08	Buell, George	San Clemente, City of	Letter	The City of San Clemente has significant concerns with the level and distribution of growth assumed in our community in SCAG’s Policy Growth Alternative Forecast as referenced in the draft 2008 Regional Transportation Plan and Program EIR. After reviewing the maps and data provided by both SCAG and the Center for Demographic Research, we have widespread disagreement with discrepancies between the Orange County Projections (OCP) 2006 and SCAG’s Policy Growth Alternative Forecast pertaining to households and employment. While, from a planning perspective, it seems reasonable to forecast growth in the number of new housing units and jobs to be near existing transit stations and employment areas, there are certain realities within San Clemente that cannot be ignored in the Policy Growth Alternative Forecast. During the City’s review of the OCP 2006 data, great efforts were made to arrive at what we reasonably expected to occur in the way of growth in San Clemente based on our existing and possible future land use policies, development activity, and knowledge of our community. In a number of areas, what we now see represented in the Policy Growth Alternative Forecast has limited bearing on existing and future conditions in San Clemente. It is important to note that the San Clemente General Plan includes policies that strive to realize a healthy jobs/housing balance. Through careful planning and implementation a 1.5 to 1 jobs/housing balance has been realized over the past fifteen years. SCAG’s Policy Growth Forecast ignores these planning and associated community-wide benefits. Additionally, the SCAG Policy Growth Forecast, as a policy document, is clearly at odds with	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of San Clemente is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>California Coastal Commission objectives and resulting law regarding open space and coastal resource preservation. The City encourages SCAG to carefully consider this important conflict. In general, it is of great concern that SCAG's sophisticated GIS/computer model forecast a reduction of hundreds of housing units and hundreds of jobs in an area that was developed less than twenty-five years ago and a number of lots have yet to be developed within a thriving business park (i.e. Census Tract 421.09). Another over-arching concern is the apparent omission of ~14,000 housing units and numerous jobs that will be generated by the County of Orange's 2006 approval of The Ranch Plan (Rancho Mission Viejo – RMV). Unfortunately, if errors such as these exist, it would call into question the reliability of the data and methodological underpinnings used in the model.</p> <p>Table 1 describes specific concerns to the City of San Clemente: [See attachment for Table 1]</p>	
08-094	1/17/08	Conway, Nicholas	San Gabriel Valley Council of Governments	Letter	<p>1 of 2 Coordination with Metro's Long-Range Transportation Plan: Metro has not yet adopted its LRTP. SGVCOG would like to work closely with both agencies to avoid any inconsistencies and to ensure that SGVCOG adopted high priority projects are included in both agencies' financially constrained plans. After reviewing SCAG and Metro's draft plans both the 710 tunnel and the Gold Line Phase 11 could be in jeopardy.</p> <p>2 of 2 Proposed 710 Truck Lanes: One of the projects included in the financially constrained portion of the RTP is the development of truck lanes on the 1-710 from the San Pedro Port to SR 60. The completion of these truck lanes out of the I-15 has only been included in the strategic plan. The project scope presents the same dilemma that arose with the initial Alameda Corridor project. Given that the first section of this project is completed, there will be direct and severe impacts on the San Gabriel Valley. Furthermore, SGVCOG has previously taken an action to support a feasibility study of truck lanes on SR-60 between 710 and 57. The RTP plan indicates that a major corridor study has been completed for SR 60. SGVCOG has not seen that report or its cities participated in any review of the analysis. SGVCOG is aware that the Multi-County Goods Movement Action Plan recommends further analysis of a parallel east/west freight corridor including alternative technology analysis. While the action plan does not identify a specific route, Technical Memorandum 6B of the Action Plan states the SR-60 would be the preferred option. The SGVCOG believes that this is an incomplete analysis that requires much further study and discussion. Based on these issues, SGVCOG is requesting SCAG take the following actions. 1. Continue to study all possible east/west corridor at 01, 60, 10, 210 freeways and high desert corridor as potential alignments. 2. Take a comprehensive approach on any potential truck lanes and consider possible community impacts. As the project currently stands, the San Gabriel Valley risks being faced with a truck routes that terminates on the edge of the valley.</p>	<p>1 of 2 The Draft 2008 RTP includes the 710 tunnel and the Gold Line Phase 2 to Montclair projects referenced by commenter.</p> <p>2 of 2 Comment noted. SCAG will continue the study and use a comprehensive approach to develop a more efficient and effective regional freight system. The SR-60 Truck Lane project is a potential East-West corridor requiring further study as identified in the Strategic Plan of the 2008 RTP. SCAG recognizes that more work and consensus building needs to be done before identifying a specific East-West corridor. Modeling performed in the Multi-County Goods Movement Action Plan was completed at a macro level and results provided preliminary information that requires further study. SCAG will soon begin a study to comprehensively look at the regional goods movement system in more depth. We anticipate extensive stakeholder participation in this study. Any dedicated truck lane facilities would be available only for trucks using clean technology with low or zero emissions. SCAG is pursuing other alternatives to move goods through the region including rail and a high-speed regional transport (HSRT) system. These are discussed in the 2008 RTP and the HSRT Supplemental Report.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-095	2/12/08	Apple, Steven	San Juan Capistrano, City of	Letter	<p>The City of San Juan Capistrano thanks SCAG for the opportunity to provide comments on the Draft 2008 RTP as well as taking the time to provide PowerPoint presentations to both our Planning Commission, on January 22, 2008 and City Council on February 5, 2008. As shown on the attached maps presented to our Planning Commission (but not our City Council) both the SCAG Draft Policy Employment and Household forecasts propose significant increases in San Juan Capistrano. Of concern to our community is that such an implementation implies land use densities and design strategies inconsistent with our rural and historical sense of community. More specifically, the first sentence of the first page of the Preamble to our General Plan states "The underlying philosophy of the General Plan should be to preserve the present character of a small village-like community with abundant open space." Our community has worked hard to preserve its community character as acknowledged by our citizens voting in 1990 to tax themselves to purchase open space land, as well as the designation of the Mission San Juan Capistrano on the National Register of Historic Places. Additionally, last night the City announced it had entered into escrow to purchase an additional 109 acres of open space. Significantly increasing densities and employment as indicated on the RTP plans would not be in conformance with our community character. While the concept of linking land use planning and transportation is indeed an important one, the uniqueness of our individual communities calls for a more finesse, fine tuned approach. The utilization of Transit Oriented Developments (TODs) must be carefully reviewed as one size does not fit all. We are also concerned that while an argument may be presented that Cities are not obligated to follow the plan, future funding may be linked to the voluntary compliance of the plan. As such, and at this time, the City of San Juan Capistrano can not support the Draft RTP until adjustments, corrections and/or adequate "safety valves" are incorporated balancing the uniqueness of each City while still proactively addressing our region's future. We look forward to working with you as we progressively and together work towards enhancing each of our individual communities while also addressing the region's future.</p>	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of San Juan Capistrano is consistent with the OCP- 2006, as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-096	2/6/08	Saldana, David A.	San Marino, City of	Letter	<p>The City of San Marino is in support of the proposed future project regarding the completion of the 710 freeway. The city however, opposes any on or off ramp at Huntington Drive. The City has no other comments at this time regarding the proposed project.</p>	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-097	1/16/08	Schuiling, Ty	SANBAG	Public Hearing	Continuing the conversation we had after the SANBAG Plans and Programs Committee today, let me offer a couple of examples of why possible adoption of the policy forecast concerns me: 1) The area of largest policy forecast population reduction in the West Valley is Ontario's New Model Colony (5 contiguous traffic analysis zones [TAZs] at -5,000 or more apiece) Until now, this area, with SCAG's assistance, has been considered to be a premiere example of new COMPASS-style development in the Inland counties, including high-intensity mixed use development on a grand scale. A reduction of 25,000 people suggests we'll instead retain the cows. 2) The traffic analysis zone with the -5,000 or more population reduction in the Loma Linda/Redlands area is, in part, the area covered by the Lewis Company's University Village Specific Plan and the Holland Partners Orchard Park Development, both of which (I believe) are COMPASS-ish in design and important to ridership at the planned California Street station on the Redlands Light Rail line. 3) The TAZ with the easternmost red dot includes our offices, and also the West San Bernardino BNSF intermodal facility. Is this a good place to put 5,000+ more people than the City of San Bernardino envisioned? 4) The area of the old East Valley Corridor in north Redlands shows two contiguous TAZ's north of I-10 each receiving an additional 5,000+ people, yet the northern TAZ already has numerous distribution warehouses and the southern area is a rapidly developing commercial and office area with no residential. I think these problems illustrate why vetting a forecast with local staff, as was done with baseline, is a key part of developing a credible forecast. Clearly this has not been done for the policy forecast, nor have other issues such as impacts to transportation revenue generation (e.g., development impact fees and Measure I sales tax are sensitive to population) and the transportation strategy itself (e.g., wouldn't this alternate growth pattern result in different transportation priorities?) been addressed.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-098	1/22/08	Schuiling, Ty	SANBAG	Email	<p>1 of 2</p> <p>RE: the freight movement component of the Regional Transportation Plan, particularly in the corridor from the ports north to downtown Los Angeles, but also involving the rest of the system. The RTP's financially constrained element actually identifies four possible modes moving boxes from the ports to downtown. I mean, there's the traditional freeway, there's whatever alternate technology truckway emerges from the 710 EIS, there's the Alameda Corridor East Rail Line which could be Tier 4 or could be electrified, but at substantial cost, and then there's freight by MAGLEV. You know, I challenge the notion that we need four modes to move the boxes from the ports to downtown. And furthermore, I think the mode that gets only to downtown and then is part of the strategic element from that point on is probably the mode most likely to be important to serve the warehousing distribution centers of Eastern L.A. County and the Greater Ontario, Mira Loma, Fontana area. So of all the modes, that's probably the one that should not have been put in the strategic plan but should have been retained in the financially constrained element. So I have concerns. I don't have a solution for you unfortunately. But I would hope that between now and adoption, it would be possible to work a problem like that out.</p> <p>2 of 2</p> <p>I'd just like to point out too, though, that we have I think a process concern here. After spending a couple of years developing a baseline forecast that, in fact, is not just local general plans but also embodies local government vision consistent in many cases with the Compass Project as local jurisdictions understand it, we, within the past four months or so, had introduced to us a policy forecast which upon review, and I've shared this information now with a couple other elected officials, I shared it with you recently and also with Hasan, really shows the lack of vetting with local governments in the, I don't know, perhaps it's too strong a word, but there's some nonsensical aspects to it, including areas that have been some of the premiere Compass demonstration projects in the region. And examples of these problems include Ontario's new model colony, which the City of Ontario itself, working with SCAG, working with Fregonese Calthorpe and others, envisioned as an area that would be one of the more intense metropolitan centers in the Inland Empire, perhaps the most intense, in the policy forecast has at least 25,000 fewer people than envisioned in the Compass work. You know, these kinds of mismatches suggest that we have a right-hand/left-hand problem going on here. There are also cases in which population is being reduced or growth is being reduced in areas needed to support the feasibility of our Redlands Rail Extension in the San Bernardino to Redlands corridor. And I have other examples, and as I said, this has been submitted to both staff and other elected officials in writing, so you have copies.</p>	<p>1 of 2</p> <p>Given projections of significant container traffic growth in this region and associated air quality impacts, SCAG recognizes the need to investigate all types of transportation modes as potential alternatives to servicing the movement of goods.</p> <p>2 of 2</p> <p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Riverside County is consistent with the 2006 Riverside County Projections (2006 RCP), as documented in the 2008 RTP Growth Forecast Report, provided by the Riverside County Transportation and Land Management Agency (RCTLMA). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-099	2/19/08	Schuiling, Ty	SANBAG	Letter	<p>1 of 2 SCAG's growth policy forecast which redirects growth away from the Inland Counties (300,000 fewer people) and to the coastal counties, SANBAG has concern with, as voiced in our public comments on January 22nd. We know understand that the policy growth forecast will not be used by SCAG as the adopted forecast. SANBAG suggests that is should not become an adopted regional forecast without more opportunity for review, comment and consideration of its implications by our local governments.</p> <p>2 of 2 SANBAG has several concerns regarding goods movement issues, including the apparent redundancy of having conventional rail, dedicated truck lanes, and high speed regional transport in the same ports to central LA corridor, the demise of the full truck lane system beyond the I-710, and the feasibility of another extremely expensive technology that would in fact, have many of the economic limitations of short haul rail but no existing infrastructure or rights of way comparable to conventional rail. Staff suggests that retention of dedicated facilities for clean technology trucks that will continue to be needed to support the vast warehousing and distribution centers within Southern California's logistics districts is more critical than a new high speed technology for inclusion in the financially constrained element of the plan. The plan must also recognize that the location of these dedicated facilities will need to be defined through additional project development activity and cannot be located in a specific corridor at this time.</p>	<p>1 of 2 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for San Bernardino County is consistent with the 2035 household and employment projections, as documented in the 2008 RTP Growth Forecast Report, provided by SANBAG. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 2 Comments noted. SCAG will continue to work on the development of a comprehensive regional goods movement system and evaluate thoroughly the components of the system and examine their impacts at different geographical scales.</p>
08-100	2/19/08	McCann, Melanie	Santa Ana, City of, Planning Division	Email	The City of Santa Ana Planning Division is concerned regarding the use of SCAG's Policy Growth Forecast within the Regional Transportation Plan. While the linking of land use and transportation planning is appropriate, it is key for it to be based on practical and feasible assumptions. Staff believes the baseline forecast for the 2008 RTP should be used as it reflects the local input and the most likely growth scenario for Orange county at the present time. Thus, the Policy Growth Forecast that relies on the assumptions of the Compass Blueprint Program is not recommended for inclusion in the Regional Transportation Plan at this time.	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Santa Ana is consistent with the OCP- 2006 as documented in the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.
08-101	2/19/08	Newman, Robert	Santa Clarita, City of	Letter	The City is pleased to see the inclusion of several recommendations for improvements along Interstate 5 and State Route 14, which were brought forward by the North County Combined Corridor Study. The City is also in full support for the inclusion of the Orangeline Mag-Lev. The Mag-Lev will provide an alternative transportation need to the North County region where population growth projections are the highest in Los Angeles County. This transportation technology produces low to no pollution, which will further benefit SCAG's North County region in managing air quality. The City also supports the inclusion of the Non-Motorized Plan, which the City believes will play a critical role in improving transportation needs in the future.	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-102	1/18/08	Solow, David	SCRRA - Metrolink	Letter	<p>The Southern California Regional Rail Authority (SCRRA), operator of Metrolink commuter rail service appreciates the opportunity to provide comments on the Draft 2008 RTP. First we are pleased to see that electrification has been taken off the table for the Draft 2008 RTP. There are many impediments to implementation of electrification and CARB and AQMD are currently working with the industry to develop technologies that reduce emissions from locomotives. While Tier 3 locomotives would generate only 4.5 of the required 50 tons/day, Tier 4 locomotives are a much more cost effective approach than electrification and they both provide similar reduction for 2020 (about 21 tons/day). SCRRA will be participating in several demonstrations, but neither Tier 3 nor Tier 4 technologies are available today. The RTP assumes that Tier 4 will be fully implemented by 2020, which would mean the technology must be available by 2015. There are many impediments to timely implementation of the capital improvements and grade separations for Business Case: Rail Expansion, Emissions Reduction, and grade Separation Project. They include the following: Many of the capital improvements are outside of the railroad ROW and would have to be individually environmentally cleared. It is questionable that the 122 grade separations identified by SCAG could be environmentally cleared and built by 2020. All the proposed construction in would severely impact freight and passenger rail operations. Part of the funding package for Rail Expansion and Emissions Reduction includes \$1 billion in Metrolink bonds. SCRRA does not have revenue to back any bonds; the revenues would have to come from its member agencies. As the Business Case acknowledges, the \$1 billion would require an annual debt service of \$61.2 million; an unreasonable increase in operating expenses given the current funding commitment to Metrolink. For the period of the Draft 2008 RTP, the SCRRA member agencies have programmed all their available funds to other projects and would have to defer other mobility projects and air quality strategies to implement these measures. Mention is made that federal formula funds such as FTA Section 5307 might be a possible source for these projects, but all member agencies have already programmed these funds to other projects.</p>	<p>Comments noted. Regarding the rail engine upgrades, we recognize the tight timeline to meet the PM 2.5 deadline, and are exploring methods to accelerate implementation of this strategy through measures such as financial incentives to engine manufacturers and railroads. Please see the 2008 RTP Goods Movement Supplemental Report. We also recognize that the proposed Metrolink share of costs would require financial contributions from the county transportation commissions. SCAG's 2008 RTP assumes new sources of revenues to supplement current sources including container fee revenues and federal gas tax adjustments to support some of these initiatives.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-103	2/12/08	Antos, Charles	Seal Beach, City of	Letter	<p>1 of 4: Long-Range Growth Projections: The primary concern of the City of Seal Beach is related to the issue of long-range growth projections that are not in conformance with local agency growth projections, particularly in the years after 2015. The issue of acceptable growth patterns in the region, and particularly at the local city and county level is an area of extreme sensitivity to the local residents of those particular communities. The Executive Summary states on pages 13 and 14: "Using an integrated forecasting approach and a consensus-built growth visioning process, SCAG developed growth policies that shape the 2008 RTP Policy Growth Alternative in order to influence development patterns that reduce driving. The growth assumptions, vision, and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground "reality checks." The resulting 2008 RTP Policy Growth Alternative indicates that modified growth patterns based on these policies are modeled to show a direct positive impact on air quality in the region. SCAG's Compass Blueprint Program, in addition to legislative efforts, shapes the implementation program for enacting these policies and programs through partnerships with and services offered to cities, counties, subregions and county transportation commissions to ensure these positive effects on air quality." "Baseline" and "Policy Growth" Population, Housing, and Employment Forecasts: Review of the 2008 RTP growth forecast datasets shows the growth forecasts developed and transmitted by all SCAG sub-regions as local input have been incorporated into the 2008 RTP Baseline forecasts. For Orange County, the Orange County Projections 2006 (OCP-2006) database, which was developed in coordination with the Center for Demographic Research (CDR) at Cal State Fullerton, Orange County Transportation Authority (OCTA), and all local governmental agencies within Orange County, is included in the 2008 RTP "Baseline" forecast at Year 2003 (the RTP base year) and for Year 2035 (horizon). SCAG has also included within the 2008 RTP a "Policy Growth" forecast that promotes an advisory and voluntary re-direction of future growth in the SCAG region. The "Policy Growth" forecast proposes intensifying land use near transit stations and employment centers and reducing growth in outlying areas to achieve objectives such as reduced congestion and reduced vehicle miles. This "Policy Growth" forecast is consistent with OCP-2006 projections through 2015, but after that a redirection of population, housing and employment is projected that is not consistent with the OCP-2006 approved projections for the County of Orange. Any dataset other than the Baseline forecast that is adopted by SCAG's Regional Council as the official growth forecast for the SCAG region for the 2008 RTP would supersede the 2006 Orange County Projections, and raises concerns on the integrity of Orange County's transportation projects. Local governments and agencies that rely on the OCP and the RTP projections for future planning would be impacted. For example, identifying growth in areas where no growth is likely to occur could result in a required allocation of funds to improve infrastructure that will not be used and/or a lengthy justification for not doing so. It also may impact funding and</p>	<p>1 of 4 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Seal Beach is consistent with the OCP- 2006 (as documented in the 2008 RTP Growth Forecast Report). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document. 2 of 4 Comment noted. Detailed information regarding the baseline and policy growth forecasts, including regional emission analysis for each case was presented to the SCAG CEHD policy committee at its March 6, 2008 meeting. The SCAG Regional Council, based on CEHD's recommendation, approved using the Baseline Growth Forecast in the Final 2008 RTP. The conformity analysis in the Final RTP will be based on the adopted Baseline Growth Forecast. See also Master Response 1 regarding the RTP Growth Forecast, Section III, and Final RTP PEIR. 3 of 4 Comment noted. 4 of 4 Comments noted. SCAG remains committed to a cooperative approach with local governments on goods movement and air quality issues.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>revenue projections as growth is shifted. There is also the potential for environmental litigation against an agency not implementing the growth vision identified in a regional plan to alleviate air pollution impacts that when not implemented result in health impacts.</p> <p>CDR has conducted a comparative analysis of the "Policy Growth" forecast and has determined that it is not consistent with OCP-2006 as follows:</p> <ul style="list-style-type: none"> - The county level projections for population, households, and employment at Year 2035 differ within Orange County to the extent of an additional 45,000 persons, 15,000 households, and 9,500 jobs above the OCP-2006 projections, and - Within Orange County at the census tract/traffic analysis zone level, the locations of future growth sometimes are shifted significantly among the census tract/traffic analysis zone levels, up to a 377% increase over the OCP-2006 projections. The Seal Beach Department of Development Services has reviewed the "Policy Growth" forecasts for each census tract in Seal Beach and is of the opinion that the following "Policy Growth" forecasts are overstated and not consistent with the adopted growth policies of Seal Beach, as articulated in its General Plan and Zoning Land Use development standards as indicated below. The City of Seal Beach requests that SCAG modify its "Policy Growth" Forecast as indicated in the following Table. All remaining census tracts within the City are within 1% of the OCP-2006 projections and our City staff has no concerns regarding those very slight modifications. At a meeting of SCAG, CDR, OCTA, and OCCOG representatives on January 15, 2008 the growth forecast issues were again discussed and SCAG committed to working with Orange County to make all necessary corrections to the growth forecast. The City of Seal Beach appreciates SCAG staff's willingness to work with OCCOG, CDR, and OCTA to ensure that the growth assumptions for Orange County population, households and employment in the 2008 Draft RTP are consistent with the locally approved growth forecasts. A consistent set of growth projections between SCAG and Orange County is critical for major planning projects, environmental documentation, and transportation modeling efforts. That cooperation is greatly appreciated. 2008 RTP "Policy Growth" Forecast Inconsistencies: Census Tract (City Area): 995.04 Growth Type: Households Basis for Inconsistency: Projects an additional 399 housing units in an area developed with an existing, stable, single family residential area, public facilities and a recently approved business park. Area is built out and all remaining undeveloped areas are deed restricted by Costal Development Permits to only allowing for wetland and upland habitat restoration projects. The OCP-2006 information should be retained. Census Tract: 995.04 Growth Type: Employment Basis for Inconsistency: Projects a loss of 49 jobs. The 182 jobs allocated to Census Tract (City Area): 995.10 (Leisure World) should be allocated to this Census Tract as a new business park development as recently been completed which would create the additional employment opportunities. Census Tract (City Area): 995.10 Growth Type: Employment Basis for Inconsistency: Projects an additional 182 jobs in an area that is 99% developed as a senior retirement living community. Jobs should be allocated to Census Tract 995.04, as discussed above. 	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>2 of 4: Conformity Analysis - The Draft 2008 RTP forecasts transportation needs through 2035. SCAG must include all regionally significant transportation improvements for these projects to be eligible for Federal or State funding or to receive the necessary approvals for implementation. In addition, the RTP must identify reasonably available funding sources for all projects (financially constrained) and demonstrate "conformity" with the air quality requirements of the State Implementation Plan (SIP). SCAG indicates the following regarding "Transportation Conformity Analysis": "This Plan must pass the following tests and analyses to meet the requirements for a positive conformity finding: - Regional Emission Analysis - Timely Implementation of Transportation Control Measures (TCMs) Analysis - Financial Constraint Analysis - Interagency Consultation and Public Involvement Analysis. The draft conformity analysis indicates a positive conformity finding for the Draft 2008 RTP based on the draft emission budgets received by the Air Resources Board and the other required tests. The formal conformity finding will be based on the finalized emission budgets analyzed in comparison to the RTP as prepared for adoption. The detailed transportation conformity analyses for the 2008 RTP are included in the 2008 RTP Conformity Report." (2008 RTP, Executive Summary, pages 27 and 28) The above discussion regarding "Conformity Analysis" within the 2008 RTP seems to indicate that the 2008 RTP "Baseline" Project meets the conformity requirements. However, at the December 11, 2007 OCCOG-TAC Meeting, a response from Jacob Lieb, SCAG Acting Manager of Environment, was read to the attendees indicating that: "given all the moving pieces associated with the 2008 RTP projects, that there is every indication that the Baseline growth forecast will meet air quality conformity, and further, that the baseline growth forecast will be modeled and run. At present, SCAG staff cannot state that the Baseline growth forecast meets conformity because the modeling runs have yet to be completed." This statement was issued 4 days after the release of the 2008 RTP. It is imperative that the SCAG decision-makers adopting the 2008 RTP clearly know if the "Baseline" growth forecast meets the necessary conformity requirements. If the "Baseline" growth forecast does not meet the conformity requirements, then the SCAG region would not be eligible for receipt of Federal and State transportation funds and the larger issue of land use and the "Policy Growth" forecasts (discussed in greater detail below) will need to be re-visited.</p> <p>3 of 4: Support of OCTA's List of Transportation Projects Throughout the RTP development process, OCTA, as Orange County's Transportation Commission, has been working with SCAG and the neighboring county transportation commissions, to ensure that Orange County's list of transportation projects – as adopted in OCTA's Long Range Transportation Plan and the Renewed Measure M Major Investment Plan – is appropriately identified and designated in the 2008 RTP, and that OCTA-adopted policy directives regarding these documents is maintained. Seal Beach supports the inclusion of Orange County's list of transportation projects, as adopted in OCTA's Long Range</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Transportation Plan and the Renewed Measure M Major Investment Plan in the 2008 RTP.</p> <p>4 of 4: Support for Identified "Goods Movement" Projects Related to Port Activities Seal Beach has provided comments over the past few years to the Ports of Long Beach and Los Angeles, SCAG, the South Coast Air Quality Management District, and the State Air Resources Board in support of programs to reduce air emissions related to both ship and vehicle transport activities at the Ports of Los Angeles and Long Beach. The RTP identifies a total of \$36.3 billion in projects to address "Goods Movement" activities throughout the SCAG region, with many of those actions and projects directly related to the Ports of Los Angeles and Long Beach.</p>	
08-104	2/18/08	Politeo, Tom	Sierra Club Harbor Vision Task Force	Letter	<p>The Southern California region will never solve its transportation problems until it manages to solve its problems with urban decay and blight. These problems in turn contribute to urban flight and sprawl. Arguably, these issues are "not in the scope" of the RTP. However, if we can't form an RTP that can hope to meet transit and pollution reduction goals (including greenhouse gasses and noise) without dealing with these sort of issues, then we must conclude that the process is flawed and inadequate. I respectfully request that you withdraw this RTP and begin a new report that looks comprehensively at our transportation issues using a systems approach and that is open to making necessary recommendations, even if acting on those recommendations is beyond the mandate for SCAG to be able to enact.</p>	Comments noted. The Final RTP contains adopted, advisory land use policies/strategies. See also the Master Responses No. 1 and No. 4, Section 3, Final 2008 RTP PEIR.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-105	1/25/08	Wallerstein, Barry R.	South Coast Air Quality Management District (AQMD)	Letter	<p>1 of 4</p> <p>A) Tier 4 Diesel Locomotive Engines vs. Rail Electrification - Given the fast approaching 2015 deadline for the annual PM2.5 standard and the level of emission reductions needed by 2015 and beyond, as well as climate change impacts of diesel use, our region has no choice but to seriously consider the reduction of emissions from diesel locomotives through electrification. We agree that where electrification is not feasible, that Tier 4 is the preferred strategy. However, we recommend that SCAG proceed to analyze zero emission technologies including anticipated costs, benefits, timelines, etc. for the electrification of existing rail system (entire and partial) as an alternative to Tier 4 engines. Thus, rail electrification must be evaluated and presented in more detail before full RTP policy and financial support of Tier 4 engines is adopted. B) Rail Expansion –AQMD is very concerned about the proposed rail expansion impacts throughout Southern California, but especially in EJ communities. The AQMD recommends the development of more on-dock rail of sorted and unsorted containers at the ports. It is concerned about locating new rail yards in existing communities. Given the AQ and health impacts of rail capacity expansion and EJ concerns, AQMD would strongly recommend that any expansion to the existing rail capacity be based on electric-ready, zero-or near zero-emission technologies. C) Dedicated Truck Lanes for Clean Technology Trucks - The draft RTP does not provide any discussion on the system as trucks converged onto SR-60. Appropriate analysis of traffic and air quality impacts is needed to avoid worsening of air quality along SR-60. AQMD recommends that the Draft RTP needs to take a system approach and does not improve a segment of transportation at the expense of another.</p> <p>2 of 4</p> <p>A) Tier 4 Diesel Locomotive Engines vs. Rail Electrification - Given the fast approaching 2015 deadline for the annual PM2.5 standard and the level of emission reductions needed by 2015 and beyond, as well as climate change impacts of diesel use, our region has no choice but to seriously consider the reduction of emissions from diesel locomotives through electrification. B) Transportation Conformity - AQMD recommends that SCAG staff maximize its TCM commitment where feasible. C) The Draft 2008 RTP provides the framework and will be the basis for the next update to the AQMP. The short and long term goals of both Plans should be consistent and promote feasible projects that lead to substantial emission reduction from near term timelines. Expenses associated with the Draft Plan need to be balanced with corresponding funding allocations and sources. The advancement of feasible, cost-effective projects should include early introduction of zero and near-zero emissions strategies.</p> <p>3 of 4</p> <p>AQMD would strongly recommend that a future HSRT system should be designed and deployed by relying on zero-or near zero-emission technologies. However, the challenges with implementation prior to 2030 portrayed in the RTP are not very practical. There are no clear timelines presented for the development and implementation of this system by phase or as a completed</p>	<p>1 of 4</p> <p>A) SCAG has listed the results of a preliminary evaluation of alternative scenarios for rail electrification in Appendix C of the RTP Goods Movement Report. The study results include estimated electrification costs, appropriate electrification milestones and their durations, and electric power consumption associated with electrified rail for three electrification scenarios. Additionally, SCAG has evaluated a zero-emissions high speed rail transport system for goods movement along with dedicated lanes for clean trucks. More information about those alternatives can be found in the 2008 RTP High-Speed Regional Transport Supplemental Report and the 2008 RTP Goods Movement Supplemental Report.</p> <p>B) Comment noted.</p> <p>C) SCAG concurs that the region needs to take a systems approach to developing transportation infrastructure--particularly for goods movement. Accordingly, further evaluation of the logistics supply chain and associated infrastructure needs (including SCAG's proposed regional dedicated truck lane system) will be the focus of an upcoming three year study effort. This study will also include the evaluation of SR-60 as well as other potential East-West corridors as a part of the regional goods movement system. This initiative will also evaluate how projects can be phased for implementation--taking into consideration the impacts resulting from one particular segment being built first. Given the size, complexity, and cost of the truck-lane system identified, for example, a phased approach to implementation is appropriate. SCAG's inclusion of the I-710 segment of the truck-lane system in the constrained plan reflects this understanding that projects will need to be implemented on a phased schedule given project-readiness/deliverability issues as well as funding constraints.</p> <p>2 of 4</p> <p>Comment noted. TCMs are continuously identified and reviewed throughout the transportation planning process. SCAG's ongoing public outreach effort and , including an involved interagency consultation input process involving the Transportation Conformity Working Group (TCWG), helps ensure that the process to identify and review TCMs is robust, inclusive, and comprehensive. Development of TCMs arises from multiple processes and multiple sources, which include CTCs, subregional agencies, task forces, committees, and the public. Project sponsors have a strong incentive to develop and help identify TCMs because TCMs receive special consideration on Congestion Management and Air Quality (CMAQ) and Surface Transportation Program (STP) funds, and are assured timely implementation in accordance with the schedule in the RTIP. These funding and scheduling incentives, along with the interagency consultation process in place, ensure that TCMs are clearly identified</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>project, and information presented on the HSRT lacks continuity, making it difficult to clearly understand the project in its entirety. AQMD recommends that a more detailed action plan be developed for this projects which delineates activities with milestones...</p> <p>4 of 4</p> <p>Compass Blueprint/EJ - We need to be cognizant about the specific locations that local jurisdictions will be directed to for creating compact development as well as areas where residents will be subject to increased diesel emissions from the anticipated expansion of transportation corridors and locomotive activities. To the extent that Compass 2% development occurs in areas of disproportionately close to diesel emission sources (from anticipated expansion of transportation corridors and locomotive activities), negative health impacts may result and must be analyzed and mitigated to the maximum extent. The statement that the Plan results in no disproportionate negative impacts on individuals based on income, race, color or national origin appears unfounded at this time.</p>	<p>and committed. Thus, SCAG and the local transportation agencies have in place a comprehensive, formal process for identifying, evaluating, and selecting TCMs. The regular RTP, RTIP, and AQMP/SIP public update processes ensure that TCM identification and implementation is a routine consideration that helps SCAG and the AQMD demonstrate attainment of applicable NAAQS. It is noted that the Reasonably Available Control Measure (RACM) analysis for the 2007 South Coast AQMP determined that the TCMs being implemented in the South Coast Air Basin are inclusive of all RACM.</p> <p>3 of 4</p> <p>Comment noted. The Southern California Regional High-Speed Transport Authority (SCRHSTA) joint powers authority for the Initial Operating Segment (IOS), once established, would develop milestones toward implementation.</p> <p>4 of 4</p> <p>The intent of the 2008 RTP Environmental Justice Analysis is to inform transportation decisions so that low-income and minority communities have ample opportunity to participate in the decision-making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2008 RTP Supplemental Environmental Justice Report evaluates region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits or burdens various demographic groups are anticipated to experience as a result of the RTP. For a detailed description of the results, please refer to the Draft 2008 RTP Environmental Justice Supplementary Report. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications. SCAG will continue to work with stakeholders to address Environmental Justice in the transportation planning process.</p>
08-106	2/19/08	Smith, Steve	South Coast Air Quality Management District (AQMD)	Email	<p>1 of 2 Is a PEIR comment to be addressed by PEIR staff</p> <p>2 of 2</p> <p>15. Conformity: The conformity determination includes projects that do not show full funding. According to federal guidelines, all projects included in the conformity analysis must show reasonable funding for the duration of the project life, i.e. Caltrans Rte. 5 HOV/Truck lanes project which has approx. \$500,000 of committed funding – this is a \$400 billion project; High Desert Corridor Toll Project has been identified as requiring a joint public/private partnership, needing some type of funding commitments. If the RTP is not accepted and subsequently approved with the above types of projects modeled, is there a contingency plan with alternative projects which can be funded with the current funding sources that are committed and available?</p>	<p>1 of 1</p> <p>See Final PEIR Addendum Section 5, Responses to Comments on the Draft RTP PEIR, letter 6.</p> <p>2 of 2</p> <p>The SCAG TCC policy committee will recommend to the Regional Council the inclusion of projects in the RTP which it deems meet the financial constraint requirements set forth under federal law and regulations. Accordingly, the regional emissions analysis for the formal conformity finding will properly include all applicable transportation projects included in the constrained RTP. Appropriate steps will be taken to resolve any issues in the event that FHWA determines that the RTP as adopted by the Regional Council, does not meet transportation conformity requirements .</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-107	1/10/08	Dewitt, Bill	South Gate, City of	Multiple Signers	We look forward to your continued and active support of the Orangeline at SCAG and in Orange County, and for its retention in the RTP.	Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.
08-108	2/19/08	Karr, Steven	South Pasadena Preservation Foundation	Letter	1 of 2: The proposed SR 710 Extension or SR 710 North is incorrectly designated an Interstate (I) in the documents. Since the early 90's the City of South Pasadena, SPPF and others, including FHWA, have continually tried to correct this error. This is a prevalent misstatement that SPPF hopes will be corrected in the final RTP and EIR and any future documents produced by SCAG and others. 2 of 2 Is a PEIR Comment	1 of 2 Comment noted. 2 of 2 See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 34.
08-109	2/19/08	Cacciotti, Michael A.	South Pasadena, City of	Letter	1 of 2 is a PEIR comment. 2 of 2 a) Correct references to I-710 to be State Route 710. b) Project 2009 should be deleted from the RTIP list, because such right-of-way acquisition is enjoined, and there is no approval either existing or pending for a freeway of six lanes and 2 HOV ones. c) A surface 710 freeway cannot be included in the RTP. d) It is not necessary to include a surface 710 freeway in the RTP for air quality conformity purposes. This project alone will not determine Clean Air Act (CAA) conformity in the South Coast Basin and is not necessary for that purpose. Any reliance on the 710 surface freeway in the conformity determination would unlawfully distort its analysis. The CAA requires modeled compliance demonstrations to be based upon realistic assumptions. e) A State Route 710 tunnel can be included in the RTP but not as a constrained project. Route 710 corridor property sales remain uncertain; the 710 tunnel proposal faces a trio of financial contingencies that disqualify the project's funding as reasonably available and therefore qualified for the constrained list.	1 of 2 See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 35. 2 of 2 a) References will be corrected in the Final RTP. b) This project is for property management along the potential future 710 corridor, and Caltrans is the lead agency. SCAG cannot unilaterally delete a project from a conforming TIP. Deleting this project would require a TIP amendment initiated by Caltrans with concurrence by LAC Metro. c) The RTP assumes that the 710 gap closure project will be a tunnel as opposed to a surface freeway. d) The federal transportation conformity rule § 93.122(a)(1) requires that the regional emissions analysis for the transportation plan and RTIP must include all regionally significant projects expected in the nonattainment or maintenance area. The analysis shall include FHWA/FTA projects proposed in the transportation plan and TIP and all other regionally significant projects which are disclosed to the MPO. e) SCAG's 2008 RTP meets fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. SCAG establishes that the new funding sources identified for the SR-710 Tunnel are reasonably available. As such, strategies delineating required implementation steps for ensuring the availability of proposed new revenues are

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
						discussed in the Finance Report Technical Appendix. These strategies include working with appropriate stakeholders to garner enabling legislation. Legislative vehicles for public private partnerships, for example, will continue to be pursued at the state level and we anticipate showing considerable progress toward implementation over the next few years. Further, SCAG has included in the Supplemental Documentation section, assumptions with respect to the tolling analyses for the SR-710 Tunnel.
08-110	2/15/08	Mootchnik, David	Southern California Commuters Forum	Letter	We, the Southern California Commuters Forum, have reviewed the 2007 Draft Regional Transportation Plan (RTP), and offer the following comments. We find the draft RTP to be another in a long line of SCAG RTP failures. It is not by accident that the Los Angeles region is known as the worst congestion area in the nation. How could it be otherwise when each RTP projects worse congestion in the future than currently measured. We contend that any plan that projects increasing congestion is a failure. It failed because it offers a bleaker future than the present. It failed by not once in the development of the RTP was serious consideration given to a solution that would reduce congestion. It failed by not giving high enough priority to congestion relief. It failed because it continuously gave priority to politically correct solutions instead of giving priority to cost effective solutions. We contend that alternative solutions exist within projected funding that would reduce congestion if more cost effective projects were selected. It failed by underemphasizing roadway projects and by overemphasizing HOV solutions in the roadway allocation. It failed by lack of innovation. It failed by basing congestion estimates on a model that is fundamentally flawed in not properly modeling roadway speeds. We request that the RTP be revised to offer a congestion reducing solution.	Comments noted.
08-111	2/19/08	Semaan, Ted	Torrance, City of	Letter	To reduce trips on the arterial network and increase the use of public transportation, a unique opportunity is presenting itself for the City to pursue the concept of a Multi-Modal Transportation Center. The Transit Center would be located on Crenshaw Boulevard at 208th Street/Metro's Harbor Subdivision Rail Lines. This location is ideal for a variety of reasons. It would: a) be in close proximity to Interstate 405 and Interstate 110; b) be a Multi-Regional Transit Center; c) attract multi-jurisdictional riders; d) be immediately adjacent to the Metro-owned Harbor Subdivision Rail Lines; and e) have the potential to incorporate into a passenger light rail use as an extension of the Green Line along the existing Harbor Subdivision. Therefore, the City would like to request having this project be included in the RTIP list and considered for potential funding.	Comment noted. SCAG's transit policy is to study and identify opportunities for improved transit connectivity, and would reasonably involve looking at the use of multi-modal transportation centers (see RTP Chapter 3). It is the intent of this policy to improve and facilitate the ability of users to move from mode to mode with ease.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-112	2/14/08	Ferrer, Roland	Torres Martinez Desert Cahuilla Indians	Letter	I'd like to thank SCAG on behalf of the Torres Martinez Desert Cahuilla Indians (TMDCI) for the opportunity to comment on the draft 2008 RTP. The TMDCI face unique challenges in long-range transportation and land use planning. Reservation lands consist of 24,000 checker-boarded acres that cross into the two counties of Riverside and Imperial. There are 62.5 miles of road within the Reservation of which 48% is maintained by the County of Riverside with the balance of the roads maintained by Caltrans and the Bureau of Indian Affairs Pacific Region (BIA). The Coachella Valley has surpassed Riverside County's growth rate and a majority of that growth will be in the east valley portion. This is evidenced by Exhibit 2.1 and 2.2 of the draft 2008 RTP. The Tribe is taking steps to master plan reservation lands by undertaking a Tribal Master Plan effort. In addition, the Tribe has received grant funding for a Tribal Transportation Plan and when completed will be folded into the Tribal Master Plan. Both of these plans will be submitted to SCAG for incorporation into the next RTP update. Although both of these plans will be limited in scope due to funding issues, we hope to build upon the plans to be on par with plans typically found in surrounding jurisdictions. Currently, the Tribe will be wrapping up a transit needs assessment report with grant funds received from SCAG. As cross-border trade activity continues to increase along Highway 86, the reservation will see increased pollution and traffic related accidents. Unprecedented growth in and around the reservation will increase the need for affordable housing. The Reservation will face cumulative impacts from this growth never before seen in this part of the County. We welcome the opportunity to work with SCAG and CVAG on such regional land use issues affecting the Coachella Valley.	SCAG supports the TMDCI's work over the past several years on the development of its Tribal Transportation Plan, and its development of a Tribal Master Plan. The collaboration between SCAG and TMDCI helps to address the challenges the area faces with long range transportation planning locally and regionally.
08-113	1/17/08	Alpern, Kenneth	Transit Coalition	Email	One small but vital input would be (for future reference) to have such hearings in the evenings as well as midday for the best available input.	In the future, SCAG will consider conducting some of our public hearings mid-day (lunch hour) and during the evening hours to make participation more accessible to more people.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-114	1/22/08	McFall, Valarie	Transportation Corridor Agencies (TCA)	Letter	The Transportation Corridor Agencies (TCA) is writing this letter to alert SCAG to inconsistencies that must be fixed in the Draft Policy Growth Forecast contained in the Draft 2008 RTP. The draft Policy Forecast base maps and housing and employment forecasts for Census Tracts 320.23 and 320.56 in South Orange County do not accurately reflect the existence of SR-241, Foothill Transportation Corridor South (FTC-S) as included in the RTP. 1) SR 241/FTC-S has been included in the RTP and RTIP since 1991 as a toll road that will be operating before 2035 2)SR 241-FTC-S is not depicted consistently on SCAG's draft policy forecast maps. For example, SR 241/FTC-S has been mistakenly left off "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Employment) OCCOG or on "TAZs Showing Draft Policy Growth Forecast Greater Than Draft Baseline (Housing)OCCOG." Instead, the maps show SR 241 terminating at Orso Parkway. Both of these maps are used by SCAG in public presentations and are available on SCAG's website. The SR 241/FTC-S project schedule calls for two lanes in each direction to open to traffic in 2013, with three lanes in each direction by 2030; this updated project schedule will be incorporated into the 2008 RTP and RTIP. 3) SR 241/FTC-S is a key example in the SCAG region of a privately financed toll road. Toll roads are a major feature in SCAG's forthcoming 2008 RTP. Toll road construction bonds must be repaid from toll revenue. SR241/FTC-S is also a TCM in the RTP and AQMP that is supposed to receive priority for completion due to its air quality benefits to the transportation system. However, SCAG's draft policy forecast eliminates substantial revenue-producing resident and employment population on the corridor that has been projected since 1991. The draft Policy Forecast undercuts the air quality goals and transportation control measures of the RTP and AQMP. Please remedy these South Orange County inconsistencies in the 2008 RTP and Policy Forecast: -Please accurately depict the SR 241/FTC-S alignment. - Please convene a stakeholder meeting with representatives from the County of Orange, TCA, OCTA and the OCCOG prior to Feb. 18 to resolve this issue.	On March 6, 2008, the SCAG Regional Council adopted the Baseline Growth Forecast with a statement of advisory land use policies/strategies for the 2008 Regional Transportation Plan (RTP). The Draft 2008 RTP has been revised consistent with this decision of the Regional Council, including removal of the text and tables regarding the Policy Growth Forecast. (See RTP Chapter 3 and the Growth Forecast Appendix). The adopted statement of advisory land use policies/strategies, originally approved by the SCAG Community, Economic, and Human Development (CEHD) Committee, will remain in Chapter 3 of the Final RTP and in the Growth Forecast Appendix. For further information on the adopted growth forecast in the RTP, please also see Master Response No. 1, Section 3, Final 2008 RTP Program Environmental Impact Report (PEIR) Addendum. The Baseline Growth Forecast is consistent with the Orange County Projections (OCP)- 2006, as documented in the 2008 RTP Growth Forecast Supplemental Report, formerly entitled, "Integrated Growth Forecast and Regional Land Use Policies Report," and reflects the inclusion of SR-241/FTC-S.
08-115	1/30/08	Walecka, Carla	Transportation Corridor Agencies (TCA)	Public Hearing	I'm here on behalf of the Transportation Corridor Agencies, and I just wanted to bring to everyone's attention a letter dated January 22 that we submitted to SCAG staff regarding the draft policy forecast which is under Opinions of the Regional Transportation Plan. SR-241 is Foothill Transportation Corridor South, and we've noted that it is not accurately depicted on all of the base maps for 2035 in the SCAG region and would like to get that remedied. As a result of it not being fully depicted, we believe that it has been part of the decision to remove growth from portions of South Orange County and deposited elsewhere in Orange County, and this has some affects that we're very concerned about. First of all, Foothill Corridor South has been in the Regional Transportation Plan since 1991, and it's scheduled for construction and opening in 2013. And that project is a transportation control measure, which means that it's part of a package of transportation improvements in the SCAG region that's good for air quality and, in fact, is necessary for air quality. It's also listed as the transportation control measure in the Air Quality Management Plan. Removing growth from planned locations in South Orange	The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Riverside County is consistent with the 2006 Riverside County Projections (2006 RCP), as documented in the 2008 RTP Growth Forecast Report, data provided by the Riverside County Transportation and Land Management Agency (RCTLMA). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					County has the effect of removing patronage and revenue from the toll road which would be used to repay bonds, and in a sense, this is undercutting the goals of not only the Regional Transportation Plan but also the Air Quality Management Plan. So we've requested two things: One is, let's clearly depict the routes on all of our base maps and transportation documents. And secondly, we ask that SCAG can be stakeholder meeting of all of the jurisdictions and agencies that are affected by the growth of policy forecast allocation in South Orange County to see if it can find a suitable resolution. It's very important that this project go forward for air quality purposes. It's important for it to go forward for congestion management purposes.	
08-116	2/19/08	McFall, Valarie	Transportation Corridor Agencies (TCA)	Letter	<p>1 of 3 RTP Project Listing Report, page 96-99, and Modeled Projects List: The project listings for the San Joaquin Hills Transportation Corridor (SR 73), Eastern Transportation Corridor (SR 241/261), Foothill Transportation Corridor-North (SR 241), and Foothill Transportation Corridor-South (SR 241) require updates as indicated in Attachment B in order to reflect the latest project information approved by the respective Boards' of Directors of the Foothill/Eastern Transportation Corridor Agency and the San Joaquin Hills Transportation Corridor Agency. These project description revisions must be reflected in the Project Listing Report appendix, which contains a comprehensive list of Orange County projects included in the RTP on pages 96 through 99. Further, the updated project listings in Attachment B should be added to the Modeled Projects List in the Transportation Conformity Appendix of the RTP, and included in the final RTP conformity analysis. RTIP Project Listing Report, page 42: Consistent with the revised project descriptions discussed above, improvements to the San Joaquin Hills, Eastern and Foothill-North Transportation Corridors are scheduled for the 2008/2009 through 2012/2013 timeframe. We request that these improvements, described in Attachment C, be listed in the Project Listing Report's Orange County RTIP section, starting on page 42. These near-term project improvements should also be referenced in SCAG's Timely Implementation report in the Transportation Conformity Report. RTIP Project Listing Report, page 42: Consistent with the revised project descriptions discussed above, improvements to the San Joaquin Hills, Eastern and Foothill-North Transportation Corridors are scheduled for the 2008/2009 through 2012/2013 timeframe. We request that these improvements, described in Attachment C, be listed in the Project Listing Report's Orange County RTIP section, starting on page 42. These near-term project improvements should also be referenced in SCAG's Timely Implementation report in the Transportation Conformity Report.</p> <p>2 of 3 Draft RTP, Page 55: Baseline Forecast as Basis for RTP. Consistent with our January 22, 2008, comment letter and federal requirements to base the RTP on the best available growth assumptions reflecting local plans and policies, we urge SCAG to base the final RTP upon the Baseline Forecast that reflects the latest approved development projects occurring in and around the SR 241 alignment. In light of project entitlements, a "Policy Forecast" distribution of</p>	<p>1 of 3 References to the interim projects for San Joaquin, Eastern, and Foothill-North will be added to the Project List and Modeling List and included in the regional emissions analysis, along with updates to the Foothill-South corridor. The TCM Timely Implementation Report, included as part of the RTP Conformity Supplemental Report, also accurately describes the scope and schedule of these TCMs.</p> <p>2 of 3 References to the interim projects for San Joaquin, Eastern, and Foothill-North will be added to the Project List and Modeling List and included in the regional emissions analysis, along with updates to the Foothill-South corridor. The TCM Timely Implementation Report also accurately describes the scope and schedule of these TCMs.</p> <p>3 of 3 See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 27.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					growth in this area is both unlikely and at odds with the transportation and air quality strategy of the RTP which includes SR 241. 3 of 3 Is a PEIR Comment	
08-117	2/19/08	Amante, Jerry	Tustin, City of	Letter	<p>1 of 4 SCAG should use the 2006 Orange County Projections (OCP-2006) for population, employment, and households in any adopted 2008 RTP growth forecast for the Orange County subregion. On page 55 of the Draft RTP, it is stated that "The implementation of the policy growth forecast would be voluntary and it complements the baseline growth forecast." However, adoption of the Policy Growth Forecast for use in the RTP would result in mandating the policies embodied in the Policy Growth Forecast. Thus, the SCAG should only adopt the Baseline Growth Forecast for use in the 2008 RTP. The statement [Baseline Forecast as supporting urban sprawl, p. 62] in the Draft RTP does not properly characterize the growth that is taking place and is projected throughout Orange County, including Tustin. For example, the Tustin Legacy project at the former Marine Corps Air Station Tustin is a significant infill project located in close proximity to transit and employment centers. Therefore, the mischaracterization of the Baseline Forecast should be deleted from the Draft RTP. Instead, examples should be provided of the many jurisdictions which are promoting growth principles consistent with those identified in the Draft RTP.</p> <p>2 of 4 SCAG should incorporate the Orange County Transportation Authority's list of transportation projects submitted to SCAG for incorporation into the 2008 RTP. These projects have already been included in OCTA's Long-Range Transportation Plan and the Renewed Measure M Major Investment Plan. All Regional Transportation Improvement Program (RTIP) projects located in Tustin should be included in the 2008 RTP, including the following which may have been missed: a. Modify Northbound SR 55 Ramps to connect to Newport Avenue Extension between Edinger Avenue and Valencia Avenue;b. Tustin Ranch Road Extension from Walnut Avenue to Edinger Avenue, with new grade separation at Edinger Avenue; and c. Red Hill Avenue Grade Separation at Edinger Avenue/railroad tracks.</p> <p>3 of 4 OCTA has not committed to making the right-of-way available for use by the OLDA. Therefore, SCAG should remove the Orangeline project from the RTP Constrained Plan.</p> <p>4 of 4 is a PEIR comment</p>	<p>1 of 4 The phrases "business as usual" and "urban sprawl" in the characterization of the Baseline Growth Forecast have been removed from the 2008 RTP. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006 as documented in the 2008 RTP Growth Forecast Supplemental Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 4 Comment noted. The Tustin Ranch Rd (#ORA55244) and Red Hill Ave (#ORA000177) projects are included in the RTP project listing as RTIP projects. The SR-55 ramps project (#ORA55261) is "previously obligated" and has no current programming, however it is still accounted for in the RTP modeling and regional emissions analysis.</p> <p>3 of 4 Comment noted. As of the April 11, 2008 TCC meeting, the Orangeline HSR project (Palmdale to Irvine) has been moved from the Constrained Plan to the Strategic Plan, subject to RC approval on May 8, 2008.</p> <p>4 of 4 See Final PEIR Addendum Section 5 Responses to Comments on the Drat RTP PEIR, letter 28.</p>
08-118	2/19/08	Moore, Scott D.	Union Pacific	Letter	Union Pacific Railroad appreciates the opportunity to comment on the 2008 Draft Regional Transportation Plan (Draft RTP). Union Pacific supports the comments being submitted by the Association of American Railroads and its member companies, and supplements those comments in this letter regarding issues specific to our business. As you may be aware, Union Pacific has applied	SCAG does not specifically identify the ICTF modernization project in the 2008 RTP Project Listing.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>to the Intermodal Container Transfer Facility Joint Powers Authority for approval to modernize UP's facility (the "ICTF") near the Ports of Los Angeles and Long Beach. These modernization projects will double the number of containers handled at the ICTF, while reducing particulate matter emissions by 74%. Union Pacific is proud of the important efficiencies this project will bring along with significant reductions in air emissions. We understand that the Draft RTP does not include any reference to the ICTF modernization project because the project is not receiving federal funding and is not "regionally significant" under EPA's transportation conformity rule. We do not disagree with this reasoning, but want to confirm that SCAG's decision not to include the ICTF in the RTP was considered. Federal regulations set forth requirements for an RTP. With respect to freight rail projects, the RTP must include "[e]xisting and proposed transportation facilities (including major roadways, transit, multimodal and intermodal facilities, pedestrian walkways and bicycle facilities, and intermodal connectors) that should function as an integrated metropolitan transportation system" 23 C.F.R. § 450.322(f)(2). In addition, the RTP must include "design concepts and design scope descriptions of all existing and proposed transportation facilities in sufficient detail, regardless of funding source, in nonattainment and maintenance areas for conformity determinations under EPA's transportation conformity rule." 23 C.F.R. § 450.322(f)(6). Certain projects are exempt from the transportation conformity requirement. Specifically, EPA exempts projects related to: "Reconstruction or renovation of transit buildings and structures (e.g., rail or bus buildings, storage and maintenance facilities, stations, terminals, and ancillary structures); "Rehabilitation or reconstruction of track structures, track, and trackbed in existing right-of-way; "Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 C.F.R. part 771; and "Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)." 40 C.F.R. § 93.126. The ICTF is a terminal or station that functions to support the overall rail system. As a project involving renovation or reconstruction of rail-related building structures and support facilities, the ICTF is specifically exempt from the conformity determination. Thus, because the ICTF is not receiving federal funding, and is exempt from the transportation conformity determination, it need not be included in the RTP or the RTIP.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-119	2/19/08	Sturges, Susan	US EPA	Letter	<p>1 of 3 Maintain and Expand Compass Blueprint Growth Policies in the RTP. To the extent possible, EPA recommends incorporating concepts of the Envision Alternative into the Final RTP.</p> <p>2 of 3 a) As applicable to the RTP, identify mitigation measures which are at least as stringent as Clean Air Action Plan (CAAP) requirements. b) Clarify in the RTP how the RCP or the Compass Blueprint effort influenced any current design and route network location decisions.</p> <p>3 of 3 a) EPA recommends the Final RTP include: a discussion of the public health implications to the region and, specifically, to communities adjacent to ports and major freight transportation corridors. EPA recommends that SCAG include such a discussion in the "Transportation Planning Challenges" section of the Final RTP. b) Include a description of cumulative impacts on public health and the current environment as well as trends that have contributed to impacts and/or losses to these resources. We recommend SCAG include a description of cumulative impacts and describe the current trends associated with impacts on public health and resources. c) Include additional opportunities to expand upon emission reduction strategies above and beyond current regulations. EPA recommends that SCAG identify other opportunities where additional coordination could lead to currently unidentified strategies. d) Include additional RTP Performance Standards to measure environmental results of the RTP, such as a surrogate to measure the Plan's success in protecting sensitive habitat. Given that the region has experienced significant losses to species and habitat from development encroachment and transportation construction, the RTP should identify additional performance standards to demonstrate how the RTP will meet its environmental goals. e) Clearly describe how SCAG's multiple planning efforts (the RTP, RCP, and future Opens Space Guidance) will be coordinated to inform regional avoidance and minimization of impacts to resources (page 131 of RTP). f) Work through and resolve resource and regulatory agency concerns during early corridor and project planning. This approach envisions that transportation options will be developed with consideration for environmentally sensitive land-uses and habitat issues as part of the planning and design criteria. For successful early collaboration, EPA recommends that project proponents ensure that the early coordination provides a genuine opportunity to work through and resolve agency concerns during the planning stage and is not used an opportunity simply flag issues to discuss at a later date during project development and the NEPA and CEQA processes.</p>	<p>1 of 3 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 of 3 The 2008 Draft RCP has not yet been adopted by the Regional Council. Therefore, the RCP did not influence the design or route network location decisions. Compass Blueprint is a voluntary program that provides planning tools to achieve compact development thereby protecting undisturbed land. The RTP includes advisory land use policies/strategies that encourage dense urban centers. The RTP also includes intra-city transportation projects that are designed to improve mobility. Furthermore, in urban areas, the RTP includes transit projects that encourage mode choice and can help reduce auto-oriented development in the less urbanized areas.</p> <p>3 of 3 (a) The Final 2008 RTP provides a discussion of air quality challenges in Chapter 2, Transportation Planning Challenges, that highlights the health impacts of air pollution, namely from PM2.5 exposure, on people living in the South Coast Air Basin. This is estimated to result in 5,400 premature deaths and 980,000 lost work days per year. (b) The PEIR includes a regional scale discussion of air quality cumulative impacts as appropriate in a program level document (see 3.2-26). This analysis indicated that although the SCAG region will achieve transportation conformity at the regional scale, air quality impacts would remain cumulatively considerable. This analysis includes estimates by the South Coast Air Quality Management District (SCAQMD) for train, aircraft, ship and commercial boat and all other sources. See Response to Letter 1, Section 4, Final 2008 RTP PEIR. The PEIR also includes a discussion (Air Quality 3.2-6) of the health impacts of certain pollutants, such as particulate matter that have been shown to result in negative health effects. See also the Screening Risk Assessment, PEIR Appendix B. (c) Comment noted. As required by the California Environmental Quality Act (CEQA), the PEIR identifies all feasible mitigation measures. It is also noted that the region has attempted to coordinate with the U.S. EPA via the SIP process as well as other planning processes and initiatives (e.g., Southern California Gateway Cooperative Agreement) to ensure that federal sources are adequately controlled in order for the region's on-attainment areas to meet federal emission standards. Federal sources make up a substantial and growing portion of the emissions inventory, and state, regional, and local entities face significant challenges to controlling these sources due to federal preemption. (d) The RTP is a regional-scale document that includes goals for protecting the environment, improving air quality, promoting energy</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
						<p>efficiency, and encouraging land use and growth patterns that complement transportation investments. Individual projects that are part of the RTP will still undergo extensive environmental review and require an EIR pursuant to CEQA at the project level. See Master Response No. 2, Section 3, Final RTP PEIR. As required by CEQA, each project EIR must disclose impacts to biological resources, including sensitive habitat and open space and include mitigation measures to mitigate or avoid these impacts. Upon certification of a project EIR, a Mitigation Monitoring and Reporting Program (MMRP) is developed for ensuring compliance with mitigation measures. SCAG also adopts a MMRP to monitor implementation of mitigation measures by Lead Agencies. Additionally, SCAG's RTP PEIR, while also a programmatic document, provides mitigation measures to mitigate and avoid impacts to biological resources. See mitigation measures, MM-BIO.1 through MM-BIO.45 and MM-OS.1 through MM-OS.45 in the RTP PEIR. Each project's MMRP should reference, where appropriate, mitigation measures included in the RTP PEIR. (e&f) For projects that are considered regionally significant under CEQA Guidelines, Sections 15125(d) and 15206(a)(1) and pursuant to Public Resources Code Section 21083(d), SCAG will conduct a consistency review of the proposed project with regional plans including the RTP, through its Intergovernmental Review (IGR) process. Projects are reviewed for consistency with the Regional Transportation Plan (RTP). Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. SCAG reviews EIRS for projects of regional significance for consistency with regional plans per the CEQA Guidelines, Sections 15125(d) and 15206(a)(1), and Public Resources Code Section 21083(d). Additionally, SCAG is the authorized regional agency for Inter-Governmental Review of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review).</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-120	2/14/08	Cacatian, Ben	Ventura County Air Pollution Control District	Letter	<p>Comments on the Conformity Report:</p> <p>Page 4 Remove TCMs from the Applicable Budgets heading since TCMs are addressed separately under the Applicable TCMs heading. Page 6 You mention the “interim emissions test” under Regional Emissions Analyses heading but don’t clearly describe it until page 7, section II. If you could explain or give an example on the difference between an emissions budget and interim emissions test, under this heading, I believe it would help clarify when the budget consistency is needed versus an emissions test. Page 7 Ozone SIP is 2008, not 2007. Ventura County has been working on the 8-hour ozone SIP since 2006. It was our intention to submit the 8-hour ozone SIP to EPA in June 2007, however, the modeling of our attainment demonstration and changes in the Reasonable Further Progress policy have delayed our submittal for sometime in 2008. As you have mentioned in the 2008 Draft RTP, ARB and EPA are working on an Early Progress Plan (EPP) to establish a motor vehicle emissions budget for the Draft 2008 RTP conformity requirement. As soon as the 8-hour ozone SIP is submitted and the motor vehicle emissions budget is found adequate, a new emissions budget for conformity will be established. Page 7 The following terms, Build and Plan Scenarios, are used in several places and it is unclear if the both scenarios mean the same thing. Page 8 Under the Regional Travel Demand Model Overview heading, a statement is made that the model was validated for the year 2003, the base year for the 2008 RTP. However, earlier in the appendix it mentions 2002 as the RTP’s base year. This discrepancy should be corrected. Page 23 The Ventura County EPP will be for the moderate nonattainment designation originally assigned by EPA and will include a motor vehicle emissions budget for year 2009. The District has requested that ARB formally submit a request to EPA for a voluntary reclassification of Ventura County from a moderate to serious nonattainment area. Once the Ventura County SIP is submitted and the motor vehicle emissions budget is found adequate, the emissions budget established by the EPP will be superseded. Page 37 The streamline process for reporting and monitoring TCMs is commendable. However, the process for substituting TCMs requires a bit more effort and should also be streamlined, especially for smaller TCM projects. Page 38 No emission reduction credits are claimed outside of what is included in the Regional Transportation and EMFAC2007 modeling. The TCM categories described in the Ventura County SIP provide a basis for transportation and transit officials to understand which projects are considered TCMs. Projects that fall into one of these TCM categories will be programmed as TCMs and thus given federal funding priority. The timely implementation of these TCM projects will also be monitored and reported at each RTP/RTIP update cycle. There are projects not on the Listing of TCMs Subject to Timely Implementation beginning on page 59 of the appendix. These Ventura County projects may have been identified or listed as a TCM in recent RTIPs. Please review the list and provide status or information. Refer to letter.</p>	<p>Comments noted. Suggested edits will be incorporated. Until the 2008 SIP is approved, references will be to the 1994/1995 SIP. D) The Build and No Build scenarios are constructed based on criteria in transportation conformity rule. These are used for interim emission tests. For the motor vehicle emissions budget test, the Plan is compared to the budget. The Plan and Build are the same networks, but may differ in socio-economic. The final 2008 RTP will clarify the distinction between the “base year” (i.e. 2002) for purposes of transportation conformity PM 2.5 and the “base year” for the RTP (i.e. 2003). Comment noted. SCAG is working closely with ARB to develop emission budgets for the upcoming SIP. SCAG will make appropriate conformity findings for approved emission budgets as required by the federal Conformity Rule and the Clean Air Act. Comment noted. The process for TCM substitution is set forth in federal law. SAFETEA-LU has revised the TCM substitution requirements with the goal of streamlining the process. Nevertheless, TCM substitution still requires a substantial effort for stakeholders, and SCAG encourages project sponsors to make all efforts to deliver committed TCMs on schedule. H) Comment noted. I) The Final 2008 RTP TCM Timely Implementation Report will appropriately account for these committed TCM projects.</p>
08-121	2/13/08	Maulhardt, Dean	Ventura County	Letter	<p>1 of 2: The Commission appreciated the presentation on the RTP given by SCAG’s TCC</p>	<p>1 of 2 Comment noted. Many cities require commercial buildings over a</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
			Transportation Commission (VCTC)		<p>Chairman Alan Wapner at its' January meeting and would like to compliment SCAG on the efforts to pull together such a massive and critically important document that will guide Southern California's transportation efforts for the next several years.</p> <p>We also appreciate the recognition given in the RTP to the Rice Avenue extension project in Ventura County, which will greatly improve access to/from the Port of Hueneme and the movement of goods throughout the region and the nation. We have some minor suggestions/corrections to the draft document. First, in the non-motorized transportation discussion, it would be helpful to encourage large and proposed employers to promote this type of transportation by adding/improving bicycle storage in employer parking facilities.</p> <p>2 of 2:</p> <p>Also, in the Transit Section, South Coast Area Transit or SCAT is now Gold Coast Transit, and the express bus network map should include Ventura County and Los Angeles/Santa Barbara Counties.</p>	<p>certain size to have accommodations for cyclists, including parking and shower facilities. In California, all state buildings are required to accommodate bicycle parking, (California Government Code 14679.5).</p> <p>2 of 2</p> <p>Comment noted. These requested changes will be addressed in the final 2008 RTP.</p>
08-122	1/22/08	Viera, Kevin	Western Riverside Council of Governments (WRCOG)	Public Hearing	<p>We are supportive of the baseline forecast that has been presented by SCAG staff. We strongly would recommend that SCAG and the elected officials adopt the policy forecast as purely advisory and nothing more than that. We do have somewhat of an issue with the way the numbers have been transferred from the inland area to the coastal regions based on those numbers and current policies through other state mandated programs to require such a huge shift of housing and population down the road. I also have somewhat of an issue with the way that future planning is to locate. While the concept makes sense to locate next to transit, I think the idea that moving them to Orange and Riverside Counties and not allowing the local jurisdictions within Riverside and San Bernardino to address the issue of growth through consolidated land development, which I think we are trying to do, has been negated somewhat under that policy.</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Riverside County is consistent with the 2006 Riverside County Projections (2006 RCP), as documented in the 2008 RTP Growth Forecast Report, provided by the Riverside County Transportation and Land Management Agency (RCTLMA). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-123	2/19/08	Viera, Kevin	Western Riverside Council of Governmen ts (WRCOG)	Letter	<p>1 of 13: Section or Chapter: Executive Summary Page: 13. Comment: Integrated Land Use - It should be noted that SCAG does not have any land use authority and for SCAG's land use strategies to work greater emphasis needs to be placed on educating local officials and the public on the need to change current land use policies.</p> <p>2 of 13: Section or Chapter: General Comment Page: none Comment: The document should point out the need for preservation of existing vacated right of ways or acquire land for future transit corridors to avoid the land from being developed in to housing or other land uses. This should carry down to non-motorized corridors and not just for fixed rail or bus routes. (Noted the section on page 203 and recommend that this be moved or stated a second time earlier in the document)</p> <p>3 of 13: Section or Chapter: General Comment. Page: 9 & 66. Comment: The Minnesota Bridge failure was due to poor engineering and undersized steel plates not because of lack of maintenance</p> <p>4 of 13: Section or Chapter: Executive Summary Page: 19 Comment: The allocation of \$18 billion for high speed freight train system does not make much sense given that that money could be used to implement more and cleaner systems for moving freight. Does the \$18 Billion include all the grade separation needed to make current rail lines usable for a HSRT system? The RTP plan bases a sizable amount of goods movement and transit on electrification of trains and other modes of transit yet it does not address the additional power needs to supply all these new modes of transportation. The plan should include a section or comment on anticipated energy consumption and new energy facilities planned for construction between now and 2035 to supply these future needs.</p> <p>5 of 13: Section or Chapter: Chapter 2 Page: 50 Comment: The RTP notes that the region's population is increasing but the number of households are not increasing at a comparable rate. It is noted that household size is increasing which is attributed to cultural aspects but also due to the lack of affordable housing in job rich areas of the region. Yet the RTP proposes under its Policy Growth Forecast to allocate an additional 300,000 plus population, more than 100,000 households and approximately 60,000 jobs in the areas that can not accommodate their current needs let alone an increase above current levels. It has also been the policy with the past two RHNA cycles to allocate more housing, particularly for lower income levels, to the inland counties. If one is to follow the Policy growth forecast then the inland counties will be over building housing to meet the RHNA requirements and the coastal counties will have only 15 years to accommodate the additional 300,000 population increase stated in the Policy Growth Forecast.</p> <p>6 of 13:</p>	<p>1, 5,6,7,10,12,13 of 13 Request has been identified and changes will be reflected in the Final 2008 RTP. Also, the SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast in consistent with the local input (as documented in the 2008 RTP Growth Forecast Report) provided by the subregions and cities throughout the region. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p> <p>2 , 3, 4, of 13 Comment noted.</p> <p>9 of 13 The RTP incorporates advisory land use policies and strategies that promote compact development. As such, it promotes compact development thereby protecting undisturbed land. SCAG does not have the authority to implement or require local governments to preserve and protect open space. However, please note that the Climate Action Team's Proposed Early Actions to Mitigate Climate Change in California describes a list of strategies to be undertaken by the California Department of Forestry & Fire Protection that will further promote carbon sequestration on forest and agricultural lands.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Section or Chapter: Chapter 2 Page: 52 Comment: It is noted that the forecast uses a household size of three persons per household but recent data show household size increasing over the last seven years due to cultural background and lack of affordable housing. Would not this trend continue over the RTP planning period?</p> <p>7 of 13:</p> <p>Section or Chapter: Chapter 2 Page: 55 Comment: It states that the economic well-being of residents in the region improves during the planning period. It does not seem to account for inflation during the planning period which could have a large impact on the economy and ultimately job growth in certain sectors. Over the last seven years the region's increase in income was only 80% required to keep up with inflation. If you factor in the 3.8% annual rate of inflation over the planning period and incomes rising at 2.4% (currently) then the impact on incomes for the region will be significant.</p> <p>8 of 13:</p> <p>Section or Chapter: Chapter 3 Page: 80 under item #10 Comment: Suggest that statement read - SCAG shall support the development of subregional or multi-subregional GIS data centers for local jurisdictions to create and maintain GIS data vital for SCAG to perform regional analysis at a higher level of accuracy.</p> <p>9 of 13:</p> <p>Section or Chapter: Chapter 3 Page: 88 Comment: The plan states that future development should 'Ensure access to open space and habitat preservation...' The plan should also call for increasing the amount of open space and habitat in the region to help offset the effects of Green House Gases and to create a higher quality of life for the region's residents.</p> <p>10 of 13:</p> <p>Section or Chapter: Chapter 3 Page: 133 Comment: In the discussion on population, housing and land use SCAG notes the impact of new and expanded infrastructure can have on a community and how growth is distributed. Cities, through the general plan land use elements should encourage the development of higher density development around transit nodes like TOD's. This would then encourage transportation agencies to plan and fund projects near higher density zoned areas and help mitigate the impact of growth on a community. As part of the land use mitigation program TOD's, infill/refill and mixed use projects should be considered as a land use to aid in the efficient use of distributing growth.</p> <p>11 of 13:</p> <p>Section or Chapter: Chapter 4 Page: 145 Comment: Local development mitigation fees for transportation facilities should be mentioned in this section. Over the next 25 years it is estimated that over \$6 billion will be raised in this manner and that more growth impact</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>fees for transportation should be investigated for areas throughout the region.12 of 13:</p> <p>Section or Chapter: Chapter 4</p> <p>Page: 172 and Exhibits 5.2 & 5.3</p> <p>Comment: Under the heading of 'Mobility Benefits Attributable to the Land-Use Strategies' the document references the Baseline and Policy Growth Forecast Alternatives. There is also reference to a Baseline and Plan Freeway Speed analysis. If there is a Policy Alternative why is there no exhibit for this?</p> <p>13 of 13:</p> <p>Section or Chapter: General Comment. Page: N/A</p> <p>Comment: Throughout the document SCAG references a number of growth forecasts and alternatives. For example, on page 173 the document references the Policy Growth Alternative and then on page 202 the document discusses the using of the Policy Growth Forecast. It also discusses an Envision Alternative based on the Plan Alternative which is part of the Policy Growth Forecast. The document should clearly distinguish between the Base Year, Baseline, Plan, Policy and Envision forecasts and alternatives and how each one was developed or what adjustments to another forecast or alternative was made to arrive at the next or final forecast or alternative. A separate section should be devoted to how all these growth forecasts and alternatives can be differentiated from one another. It would be very helpful when they are referenced later in the document.</p>	
08-124	2/20/08	Bishop, Richard B.	Western Riverside Council of Governmen ts (WRCOG)	Letter	<p>1 of 4</p> <p>(p. 13), Integrated land use - It should be noted that SCAG does not have any land use authority and for SCAG's land use strategies to work greater emphasis needs to be placed on educating local officials and the public on the need to change current land use policies. The document should point out the need for preservation of existing vacated right of ways or acquire land for future transit corridors to avoid the land from being developed in to housing or other land uses. (p. 50) If one is to follow the Policy growth forecast then the inland counties will be over building housing to meet the RHNA requirements and the coastal counties will have only 15 years to accommodate the additional 300,000 population increase.</p> <p>(p. 52) It is noted that the forecast uses a household size of three persons per household but recent data show household size increasing over the last seven years due to cultural background and lack of affordable housing. Would not this trend continue over the RTP planning period?</p> <p>(p. 55) It states that the economic well-being of residents in the region improves during the planning period. It does not seem to account for inflation during the planning period which could have a large impact on the economy and ultimately job growth in certain sectors. (p.172) Under the heading of 'Mobility Benefits Attributable to the Land-Use Strategies' the document references the Baseline and Policy Growth Forecast Alternatives. There is also reference to a Baseline and Plan Freeway Speed analysis. If there is a Policy</p>	<p>1 of 4</p> <p>The advisory land use polices/strategies adopted by the Regional Council provide are founded on the Compass Principles designed to provide planning policy guidance to SCAG member cities and counties. The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for Riverside County is consistent with the 2006 RCP, as documented in the 2008 RTP Supplemental Growth Forecast Report. It is based on data provided by the Riverside County Transportation and Land Management Agency (RCTLMA). All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document. Because the Baseline was approved as the growth forecast, there is no need for an exhibit for the Speed analysis for the Policy Alternative as requested by the commenter.</p> <p>2 of 4</p> <p>Comment noted.</p> <p>3 of 4</p> <p>The proposed HSRT system would be a new system operating within existing highway rights of way. It would not operate on existing rail lines, thus, the cost of grade separations was not factored in the \$18 billion estimate. Electrification of freight or passenger rail is not</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Alternative why is there no exhibit for this? The document should clearly distinguish between the Base Year, Baseline, Plan, Policy and Envision forecasts and alternatives and how each one was developed or what adjustments to another forecast or alternative was made to arrive at the next or final forecast or alternative.</p> <p>2 of 4 page 9 & 66 - The Minnesota Bridge failure was due to poor engineering and undersized steel plates not because of lack of maintenance.</p> <p>3 of 4 The allocation of \$18 billion for high speed freight train system does not make much sense given that that money could be used to implement more and cleaner systems for moving freight. Does the \$18 Billion include all the grade separation needed to make current rail lines usable for a HSRT system? The RTP plan bases a sizable amount of goods movement and transit on electrification of trains and other modes of transit yet it does not address the additional power needs to supply all these new modes of transportation. The plan should include a section or comment on anticipated energy consumption and new energy facilities planned for construction between now and 2035 to supply these future needs.</p> <p>4 of 4 (p.88) The plan states that future development should 'Ensure access to open space and habitat preservation...' The plan should also call for increasing the amount of open space and habitat in the region to help offset the effects of Green House Gases and to create a higher quality of life for the region's residents.</p> <p>(p.145) Local development mitigation fees for transportation facilities should be mentioned in this section. Over the next 25 years it is estimated that over \$6 billion will be raised in this manner and that more growth impact fees for transportation should be investigated for areas throughout the region.</p>	<p>included as part of the strategy in the constrained 2008 RTP.</p> <p>4 of 4 1. Response to comment on RTP page 88: The advisory land use policies and strategies in the 2008 RTP promote compact development thereby protecting undisturbed land. The Climate Action Team's Proposed Early Actions to Mitigate Climate Change in California describes a list of strategies to be undertaken by the California Department of Forestry & Fire Protection that will further promote carbon sequestration on forest and agricultural lands . 2. A discussion on development mitigation or impact fees for transportation facilities is provided under Chapter 4: Financial Plan .</p>
08-125	2/21/08	Bashmakian, A	Westminster, City of	Letter	<p>We agree that the persons per household ration may increase in older built-out communities such as Westminster due to the lack of availability of developable land. Each year the Dept. of Finance figures for the City illustrate this phenomenon. The plan fails to adequately recognize that land use decisions are made at the local jurisdiction level and in the case of Westminster, that less than .05% of the City's land is vacant, that approximately ¾ of the City's land is developed with single family residential used and the City's current general plan emphasizes the preservation of the city's housing stock. Furthermore during the past 3 decades the city has not up-zoned any single family residence located in a single family R1 zoning district. While there is a need for multi-family housing, condominiums and infill housing, without the appropriate general plan and zoning mechanisms coupled with a desire on the part of the community and local decision makers to up-zone single family residential areas, we do not believe there will be any growth in the number of housing units in areas of Westminster which are zoned for and developed and single family residences. In November 2006, the city's staff attended a Compass Blueprint Program/RHNA Workshop conducted</p>	<p>The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast for the City of Westminster is consistent with the OCP- 2006 (as documented in the 2008 RTP Growth Forecast Report). Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					by SCAG. During the workshop city staff provided input and notation to the SCAG staff clarifying that certain parcels could not be developed with new housing, it appears that our comments were not included in developing the policy growth forecast used in the Draft 2008 RTP. We have submitted as an attachment to these comments land used data of census tracts within the city. It is our belief that had current land use conditions been fully considered while developing the Policy Growth Forecast, the draft RTP would indicate a slower rate of household growth for these tracts.	
08-126	2/15/08	Briskman, Linda J.	Westside Cities	Letter	We appreciate that full funding of the Exposition Light Rail to Santa Monica has been included in the Plan as a baseline project. The Expo line promises exceptionally high ridership of 61,000 passenger boardings per day, and offers to connect the east and west side of the County along a heavily congested corridor where there are no opportunities for relief. The Westside Cities are pleased the 2008 RTP includes the first phase of the Westside Subway Extension in the strategic section of the plan. We encourage that the strategic section of the plan also reflect the entire Subway to the Sea to Santa Monica. The I-10/Robertson National Area Circulation Improvement Project has also been identified as one of the top priority projects of the Westside COG to help relieve congestion. The preliminary portion of this project is listed under the RTIP portion of the RTP, and we urge the construction of the project be included in the strategic portion of the plan. The project, located near a future Exposition Light Rail Transit station, will relieve bottlenecks on I-10 and five major boulevards caused by dysfunctional on/off ramp system and street configurations.	The 2008 RTP includes the first phase of the Westside extension (also referred to as the Purple Line) in the constrained portion of the plan (see Chapter 3 Table 3.5). The I-10/Robertson National Area Circulation Improvement Project will be included in the Strategic Plan.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-127	12/19/07	Fung, Hank		Email	Why is SCAG not holding evening and/or weekend meetings as in past cycles? I'm sorry, but I have a job and cannot afford to devote half a day (or even longer) to communicating my concerns with the RTP. Evening meetings are a standard practice for most other MPOs to obtain public feedback. As you recall, SCAG was slammed earlier this year by the FHWA for not fully recognizing the importance of public participation. Please correct this and schedule some evening meetings so that the general public, not just bureaucrats and politicians, can communicate their concerns. And have we forgotten that Ventura and Imperial Counties are part of the SCAG empire as well? Please schedule some meetings there to. I am disappointed at the low level of outreach SCAG is doing, much worse than past cycles. But there is still time to correct this. Thank you.	During the 2008 Draft RTP development process, SCAG made presentations for various external organizational. These included presentations during the day as well as in the evening hours. We have also made several presentations at weekend events. In total, during the pre-draft release period (February 1 through December 5), SCAG conducted 183 presentations. From December 6 through February 29, SCAG conducted 67 presentations. This averages to about one presentation per work day. Of these, 36 (15%) were held in the evening hours. Also, SCAG reaches out to all corners of the region and has conducted presentations in all six counties within its jurisdiction. With respect specifically to presentations in Ventura and Imperial Counties, SCAG has made 8 RTP presentations in Ventura County and 6 RTP presentations in Imperial County during the last year. In accordance with SCAG's Public Participation Plan, three public hearings were conducted post-draft plan release during the month of January: one each in Riverside County, Orange County and Los Angeles County. In addition, in September and October, seven public workshops were conducted: one each in San Bernardino County and Orange County and five in Los Angeles County. All of the public hearings were conducted during business hours. In the future, we will consider conducting some of our public hearings during the evening hours.
08-128	1/18/08	McGinley, Michael E.		Email	1 of 5 1. All commercial airports should be served by high quality, attractive public transit in order to lessen the vehicle traffic impacts and to improve the quality of life of both travelers and near-by residents. The core routes should be rail links to the regional transit system, with bus lines for the less heavily traveled lines. Look to Chicago and St. Louis for models. In addition to the air transport passengers there is a large body of airport employees who commute to/from the airports who could be served. 2. Airport authorities traditionally resist public transit for three reasons. First, they claim that they cannot use airport revenues to build transit facilities because they are not, strictly speaking, airport-related. This needs a legislative fix. Second, they cherish the parking lot revenues and are reluctant to see potential air transport passengers choose transit instead of parking for a hefty fee. Perhaps they can use their parking lot land for higher and better uses and thus obtain higher rents than they obtain from the parking lots (if in fact those lots ever do end up empty). Third, the airports are influenced by the taxi and shuttle services who may be threatened by a transit option. I doubt that the need for those services will ever vanish, and they can/should be accommodated in future plans. 3. The need for added airport capacity is based in part by continued expansion of local and regional air routes. Instead of expanded or new airports, a better plan for the region and State is an integrated conventional and High Speed Rail (HSR) line, and to save the airport resource for the long routes that are not practicable for ground transportation. To this end, there needs to be excellent links (see 1. above) between any HSR lines and the region's airports.	1 of 5 SCAG's adopted Regional Aviation Decentralization Strategy, included in the 2008 Regional Transportation Plan and the RTP Aviation and Airport Ground Access Supplemental Report call for making substantial airport ground access improvements throughout the region, including an emphasis on increasing transit access to airports. Many of these improvements are included in the RTP and have been updated with strong local input from airport, city and county transportation planners. Additionally, a High-Speed Regional Transportation (HSRT) system is included in the 2008 RTP, and would create a direct and reliable link capable of connecting airports and urban centers. (See Chapter 3 of the RTP, and High-Speed Regional Transport System RTP Supplemental Report.) 2. See Response to Comment 1 above. 3. See Response to Comment 1 above. 2 of 5 1, 2 & 3, Comment noted. The 2008 RTP includes an Inland Port Strategy, which is a rail-shuttle service to move containers. Please see the 2008 RTP Goods Movement Supplemental Report. 4. For more information on our preliminary rail electrification analysis, please refer to Appendix C of the 2008 RTP Goods Movement Supplemental Report. 3 of 5 Comment noted. The 2008 RTP contains advisory land use policies

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>2 of 5</p> <p>1. Local street and highway traffic is unnecessarily impacted by retail delivery trucks, both by their timing and their choice of very large semi-trailers. I personally witness many examples of 45-foot semi trailers struggling through rush hour traffic and local city streets to deliver to Albertson's, Von's, and other retail stores. These large trucks take two lanes on both streets to execute a common right turn, they block traffic while they take several tries to line up with unloading platforms, and they are a hazard to the automobiles we drive. I suggest that the cities join together to require local deliveries to be made with smaller trucks and at nights. 2. Goods movement expansions and mitigations are legitimate uses of motor fuel tax revenues. Mitigations include separate additional truck-only lanes between the harbor and the central Los Angeles area, separate, dedicated freeway ramps to serve port and railroad trans-load facilities, grade separations between rail lines and public roads, and added track capacity for the rail lines. Specifically, the Colton Grade separation between the BNSF and UP lines should be built, including grade separations for the nearby streets, as a matter of mitigating the goods movement impacts, and motor fuel taxes should help pay for these projects. 3. A unique goods movement mitigation strategy that should be investigated is a rail-base shuttle service for container traffic from the ports (or other collection points) to outlying points (Inland Empire, Antelope Valley, etc.). Such a rail service is not presently attractive to the railroad companies because they would rather use their transportation resources to make long hauls; therefore some sort of subsidy may be required. 4. Good movement by rail could be done by electric power in order to reduce vehicle emissions in the region. The cost of conversion of the rail system to electric power and the added operating costs of removing diesel locomotives and adding electric locomotives will make this unattractive to the railroad companies. This is a social goal and the funding should relate to the social benefits and not be a burden on goods movement by rail or it will divert freight to highways, a far worse outcome in terms of emissions and congestion.</p> <p>3 of 5</p> <p>1. A very strong emphasis should be given to having new housing be constructed along lines of public transit instead of what we see now, where developments make residents totally dependent upon private automobiles. A local development on the Glendale-Los Angeles border proposes to build 229 single family residences (on an existing golf course) that is about one mile from the closest shops, restaurants, or bus lines. This is an absurd defiance of the stated goals of reducing emissions, traffic, and energy consumption. 2. Our aging population (I am 64 years old) will result in ever-increasing numbers of active citizens who cannot (or should not) drive automobiles. This is an additional reason to strongly focus housing development along transit lines. 3. The environmental process gives too much weight to avoiding noise and other impacts from rail transit, often resulting in absurd routes for rail lines or resulting in industrial land uses next to rail lines. Housing and commercial development near transit lines, including mixed-use railroads, simply has to</p>	<p>and strategies the encourage housing close to transit lines.</p> <p>4 of 5</p> <p>1. Comment noted. SCAG has included a system of new investments in high performance bus and rail transit within the financially constrained RTP that will compliment complement and expand upon the existing investments. SCAG has also identified additional rail transit projects in the Strategic portion of the plan should more resources become available. 2. Comment noted. 3. Comment noted. SCAG has identified a number of policies in the RTP to work with transit operators to encourage improved bus and rail transit reliability and performance, including efforts to use advanced ITS technologies to better manage transit operations. 4. Comment noted. 5. Comment noted. In the RTP, SCAG has identified the need for cleaner freight and commuter rail technologies and is working with both freight and commuter rail operators on solutions which reduce emissions from locomotives. 6. Comment noted. SCAG has included a number of near term intercity improvements in the RTP, but most interregional rail investments are a state responsibility. Improvements to regional and interregional rail operations are included in the Strategic element of the RTP to be advanced as funding becomes available. However, SCAG does includes part of the State HSR in our High Speed Rail elements. 7. Comment noted 8. Comment noted. 9. Comment noted.</p> <p>5 of 5</p> <p>Comment noted.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>tolerate some noise and vibration as a part of the bargain that creates mobility for those developments. That said all major crossings of the rail lines (pedestrian and highway) should eventually be grade separated; that will reduce noise impacts as well as improve safety and security.</p> <p>4 of 5</p> <p>1. Bus service that shares congested highways with auto traffic simply will not move people reliably in rush hours. The core routes of the region's system need to be rail lines, preferably grade separated from highways. 2. Rail transit is more attractive to discretionary travelers than bus travel. 3. Bus transit should be disciplined and reliable. A terrible example, frequently seen, that dis-motivates potential riders, is to see jam-packed, late buses on routes closely followed by nearly empty buses. This is a systemic problem in public transit and needs to be addressed by contemporary communication and control systems; packed and late buses should be commanded to let the following buses pass them and start filling up with the waiting passengers. 4. Bus Rapid Transit (the "Orange Line") is marginally superior to street bus service but it is very expensive to operate due to the high labor cost of operators per riders carried v. rail transit, higher energy costs, and short vehicle lives of buses v. rail vehicles. 5. Rail transit can be powered by electricity from environmentally friendly sources. Even rail lines operated by diesel locomotives in this decade can be converted in future years, this cost of conversion will be less if existing lines are planned for eventual conversion. 6. Regional and inter-regional transit should be provided by a greatly improved rail network. The high end of rail network development is the European or Japanese example of High Speed Rail (HSR); however very significant improvements to regional mobility are practicable with far lower investment levels than for a HSR system. A final configuration for the region and the State would probably have HSR as a core between the population centers of over 1 or 2 million, but should be supplemented by a rich network of local and regional services. An example of this concept would be to have a HSR route follow Interstate 5 from Los Angeles to the Bay Area and that would carry most of the non-stop travelers (and take many of those trips away from the air transport system). In addition to the HSR line, frequent regional trains in the 90 to 100 MPH range could follow the SR 99 and US 101 corridors to provide mobility to/from the citizens of those strings of communities. The present Metrolink, Surfliner, San Joaquin, and Capitol Corridor services are a starting point for these more modest improvements. 7. Strong investments in local, regional, and statewide rail transportation infrastructure may obviate the need to expand the highways. 8. A strong system of rail-based transit will be a cornerstone in efforts to reduce energy consumption, reduce emissions, and provide alternatives to petroleum-based transportation. 9. All existing active and abandoned rights of way of railroads, power transmission lines, flood control channels, and freeways should be preserved and should be considered for potential use as transit corridors.</p> <p>5 of 5</p> <p>1. I support a gradual, predictable, and eventually large increase in the motor</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					vehicle fuel tax, specifically one cent per gallon per month increase for 48 months (could be all state increase or partly state and partly Federal). A gradual increase has been demonstrated by our recent fuel price swings to cause no harm to the economy. A gradual increase will provide time for motorists to plan for changes with their next vehicle purchase or next change of residence, if they believe that fuel costs will cause a change in their lifestyle (although I doubt that it really will). 2. I support specific fees for port-related transportation impact mitigations as has been done recently. This pattern mirrors the container fees charged by the Alameda Corridor rail line to amortize the construction; this policy created the funding for the project that has greatly reduced goods movement impacts for the region. 3. I am not opposed to tolls on limited access highways ("freeways"), and I believe that such tolls can be fairly priced according to demand. As a suggestion a flat fee could be charged at every on-ramp and a toll collected at about six (?) mile intervals. Contemporary technology can make this toll collection almost transparent to travelers; wise use of the coding can protect citizens' privacy. 4. I support a restoration of the vehicle registration fees to pre-recall levels. The present governor simply pandered to anti-tax partisans, this fee was a simple property tax that was fairly assessed and paid for decades until Governor Davis unwisely lowered it. 5. I do not support another sales tax increase for transportation unless there is no way to raise motor fuel taxes or highway tolls. If the political "leadership" of the region cannot raise those most logical sources of transportation funding, then and only then should sales taxes be raised. 6. The region and/or the State may bond for wholly new transportation infrastructure investments such as subways, regional or HSR, and transit connections to airports. Such bonding should be configured with a toll, ticket, or other bond retirement funding mechanism that related these benefits to the users of the facilities.	
08-129	1/23/08	Keiser, Thomas		Email	The solution to congestion are auxiliary lanes. They make more efficient use of existing freeways at minimal cost; eliminate the need for widening; and improve safety. The problem is not capacity. The problem is one of design. Adding lanes using the same design solves nothing; not adding new lanes but paving for auxiliary lanes solves the problem. Where aux lanes exist, traffic moves smoothly such as the I-10 through West Covina.	Comment noted. Auxiliary lane strategies are included in the 2008 RTP.
08-130	1/23/08	Walter, Sheldon		Email	The SCAG region needs more rail access. Recently SCAG indicated that LA regional mobility has received an F. Expansion of the LA Regional rail system will help improve this situation. Need to reduce green house gas emissions within the region.	Comment noted. SCAG has included a system of new investments in high performance bus and rail transit within the financially constrained RTP that will compliment and expand upon the existing investments. SCAG has also identified additional rail transit projects in the Strategic portion of the plan should more resources become available. Please also refer RTP Chapter 3 and the 2008 RTP Non-Motorized Supplemental Report where alternative modes of transportation such as bicycles are discussed.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-131	1/25/08	Benson, Dale		Web form	<p>We need more heavy and light rail transit. Rail is more energy efficient than buses, land use patterns develop around rail more than buses, rail is more attractive to customers because it is smoother, quieter, and more comfortable, and it takes up less right of way than motor vehicle lanes. Light Rail, heavy rail (like the red line), and trolleys are all good, and there are appropriate applications in the SCAG region for all of these. We also need to make our streets more bicycle and pedestrian friendly to encourage people to walk and bike more often. This would be good for the environment, the economy, for health, and for quality of life. Too many auto trips are short and unnecessary. Rail is better than bus. The air quality in the L.A. basin is terrible. I know of many children in my neighborhood with asthma and other respiratory problems. We must reduce our private vehicle usage. We need to provide rail transit and safe bicycling and walking options. I have observed people starting up their cars in the morning and sitting there idling their cars idle thinking that they need to "warm them up". We should have an education program telling drivers not to do this. Creating more bicycle and pedestrian friendly streets would be good for the economy by being good for retail business. We need to mitigate for all of the freeways that were built through low-income residential neighborhoods in the 1960's, without the benefit of any environmental review. We need to close unnecessary on/off ramps, build more soundwalls, plant more trees to filter the smog, and reconnect the torn in-two neighborhoods. Covering the freeways with parks is one good solution. We need more heavy and light rail transit. Rail is more energy efficient than buses, land use patterns develop around rail more than buses, rail is more attractive to customers because it is smoother, quieter, and more comfortable, and it takes up less right of way than motor vehicle lanes. Light Rail, heavy rail (like the red line), and trolleys are all good, and there are appropriate applications in the SCAG region for all of these. We also need to make our streets more bicycle and pedestrian friendly to encourage people to walk and bike more often. This would be good for the environment, the economy, for health, and for quality of life. Too many auto trips are short and unnecessary. Rail is better than bus.</p>	<p>Comments noted. SCAG's Regional Transportation Plan includes a significant number of additional transit projects designed to compliment the recent growth in transit use. SCAG's plan is multi-modal and includes pedestrian and non-motorized elements to encourage walking and bicycling as alternatives. SCAG through its Compass/Blueprint Program works with local governments to encourage development that is supportive of our transit investments. SCAG notes that by replacing one utilitarian (shopping, for example) vehicle trip per day with bicycling or walking could be beneficial to the environment and public health. SCAG supports land use changes to enhance connectivity for pedestrians, bicyclist, and transit users through its advisory land use policies and strategies and Compass Blueprint Program. SCAG is also working to increase accommodation and planning (complete streets concept) for all modes thereby making bicycling and walking a feasible travel choice on multiple roads. The 2008 RTP Non-Motorized Supplemental Report includes a Caltrans policy based on the AASHTO statement. "In 2002, Deputy Directive 64 (DD-64) created a policy which directed Caltrans to 'fully consider the needs of non-motorized travelers (including pedestrian bicyclists and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.'" In Chapter 3 of the RTP and the Non-Motorized Supplemental Report, SCAG recommends increased planning, funding and priority for the needs of bicyclists and pedestrians. SCAG will continue to look at how to improve planning for bicyclists in conjunction with other transportation agencies.</p>
08-132	1/25/08	Medina, Shirley	Riverside County Transportation Commission (RCTC)	Letter	<p>Post mile change and completion date adjustment for RTP projects included in attachment.</p>	<p>Changes to RTIP projects will be captured through the 2008 RTIP development process. All other comments will be incorporated addressed into the RTP Project List.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-133	2/3/08	Barnett, Donna		Email	Create incentives so people work from home or a nearby office instead of driving long distances to get to work. Technologies exist so that many people can telecommute, videoconference, use webinars and more. We've got to get out of cars, and think local. Microsoft and Google are a few progressive companies helping their employees to work from home or providing buses to bring them to work. We need a more progressive workforce that stays local. Promote behavioral changes, please. I write the environmental blog Chasing Clean Air and speak out on ways to protect our air. As a public relations consultant, I also look for ways to bring industry and the public sector together to find solutions for the greater public's good. Please create and promote cleaner technologies and educate people about the importance of working from home or nearby.	Comment noted. The adopted advisory land use policies/strategies contained in Chapter 3 of the 2008 RTP include strategies that encourage the use of alternative modes of transportation to the single-occupant vehicle as well as advisory policies for land use and transportation integrated planning. Chapter 3 of the Draft RTP also discusses SCAG's support of cleaner technologies through Goods Movement strategies and High Speed Regional Transport (HSRT).
08-134	2/4/08	Smith, Richard		Email	Please provide additional information on regional disaster evacuation - mobilization using CHIPs safe corridors to "Walk Out To Safety." Please explore the 8.1-8.2 magnitude surface earthquake worst case scenario from Palm Springs North-west to Fort Tejon. Clear identification of liquefaction areas and where raised regional highways (5, 10, 91, 110, 710, 605, I210, I405, I15, etc) failed over-passes could block surface arteries would be a valuable working document for traffic & emergency management planning.	Comments noted. SCAG's 2008 RTP, Chapter 3, states that "SCAG does not intend to undertake a first response or emergency management role." California has numerous agencies that participate in their response to incidents and assist with hazard preparedness for individual jurisdictions. SCAG does not want to replicate the functions or intrude on the roles of emergency management agencies. Please consult with your county's Office of Emergency Services for more detailed information. . SCAG is working with various groups on the referenced subject. The Security Supplemental Report in the RTP states "The Disaster Mitigation Act of 2000 (DMA 2000), Section 322 (a-d) requires that local governments, as a condition of receiving federal disaster mitigation funds, have a mitigation plan that describes the process for identifying hazards, risks and vulnerabilities; identifies and prioritizes mitigation actions; encourages the development of local mitigation, and provides technical support for those efforts."
08-135	2/12/08	Alvarez, Grace		Letter	As an attachment to this e-mail, please find Cathedral City comments for the 2008 RTP.	Comments will be addressed in the RTP Project List.
08-136	2/13/08	DeCaro, Lennie		Email	1 of 3 I object to using the model "Policy Growth Forecast" instead of using the "baseline model"(consistent with a city's general plan). By using "policy growth forecasting", the protection of stable neighborhoods would be obliterated by the forecast for additional housing/employment in the area that would induce growth. It would place unwarranted demands to widen arterials and change our historic community into a driveway to the I-5 for the surrounding growth. Any further growth cannot be accommodated based on our historic scenic highway with ancient burial grounds and historic para adobe that line Ortega highway, without completely ruining numerous "stable neighborhoods" that currently line Ortega highway. Further, this would prove an unfair burden to our lower income families that reside in the condo & mobile home neighborhoods. Once widening would take place from Calle Entradero, (more correctly Via Cordova), the pressure to complete further widening from La Novia to Calle Entradero would be the next outcome, thus	1 of 3 The SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP, with a statement of advisory land use policies/strategies. The Baseline Growth Forecast is consistent with the OCP- 2006,as documented on page 19 of the 2008 RTP Growth Forecast Report. Text and tables regarding the Policy Growth Forecast in the 2008 RTP have been removed from the document. 2 of 3 Comment noted. Changes to Orange County RTIP projects should be coordinated through the Orange County Transportation Authority, which has the responsibility for providing countywide input to the SCAG RTP & RTIP. 3 of 3 Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>removing affordable housing. This is contrary to the intent of executive order W-26-92 as well as environmental justice.</p> <p>2 of 3</p> <p>Incorrect RTIP 2006 amendment. Lists under new project, new funding, etc. (p3) ORA120507, (p8) ORA120535 ORANGE COUNTY - ORTEGA HWY (SAN CLEMENTE) -WIDEN FRM 2 TO 4 LNS; CALLE ENTRADERO TO ANTONIO PKWY. Funding source PVT??? Who is funding this now?</p> <p>This incorrectly lists San Clemente instead of San Juan Capistrano. Incorrectly states widening from 2 to 4 lanes, then refers to area from Calle Entradero, (Calle Entradero is currently 4 lanes (64' geometric), not 2 lanes). Prior to 2006, project listed terminus at Via Cordova, not Calle Entradero. Project is, per CEQA requirement on the MND, ending at city limits at Ave. Siega, not to Antonio. Project has different funding sources & lead agency outside of city limits. Incorrect Hot spot analysis. ORA120535</p> <p>Incorrect information in document. Objected to during the MND, Caltrans is now in process of an EIR, which hasn't been completed to date. States it is to improve traffic flow, but concedes traffic LOS would go from LOS F to LOS F. Incorrect stated purpose, it will not improve flow, it is capacity increasing. ROW is not complete, nor is location, etc. (P.116 Tier II) PM is consistent with Via Cordova, NOT Calle Entradero 5 of 6 ORA990425 Proof that it was Via Cordova, not Calle Entradero that was the beginning terminus w/in SJC city limits is found in the RTIP (p.25)</p> <p>http://www.scag.ca.gov/pdfs/STATE_HIGHWAY_SECTION.pdf</p> <p>(p17) http://www.scag.ca.gov/pdfs/ADOPTED_2001_87_AY_PROJECTS.pdf</p> <p>lists lead agency as SJC</p> <p>3 of 3</p> <p>I object to Caltrans having the authority of NEPA, based on the numerous errors and inconsistencies Caltrans presented in their MND for widening Ortega, as well as their support for the 241 extension. Oversight is needed to prevent the politicizing of agencies in Orange County from being influenced by big developer money and contacts. Caltrans is no longer neutral, nor does it represent what is best for our county or state. I only include this statement to SCAG as I believe the FHWA will also be reviewing letters from the public. I would like to see the "NEPA pilot program" halted for perceived bias and obvious errors and inconsistencies from Caltrans documents or oversight of documents.</p>	
08-137	2/15/08	Alvarez, Grace		Letter	As an attachment to this e-mail, please find the City of Moreno Valley RTP comments.	Changes to RTIP projects will be captured through the 2008 RTIP development process. All other comments will be addressed in the RTP Project List.
08-138	2/15/08	Alvarez, Grace		Letter	As attachments to this e-mail, please find the City of Riverside RTP comments for their projects as well as an addition to the RTP for Van Buren Blvd from Jackson St. to Garfield (Local Roads).	Comments will be incorporated addressed into the RTP Project List.
08-139	2/15/08	Anderson, Stephen		Email	The problem with many transportation plans is that they are concerned only with traffic flow and do not interact with community needs and differences. Mira Loma is working to control its air particle pollution problem that is	Comment noted. An inland port facility is one of the goods movement strategies in the 2008 RTP. A recent study conducted by SCAG considered the potential feasibility of an inland port. Mira

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					compounded by Warehouse over-development. Any design to bring in more diesel pollution is at the expense of current efforts to control the existing air pollution problems. Consequently, new railroad yards, truck routes or depots will not be appreciated as much as by those that proposed them.	Loma was identified as a preferred area because of the large number of logistics activities already concentrated there and the consequent potential of an inland port to reduce regional vehicle-miles-traveled (VMT). However, the study only identifies potential locations. Results of the study do not name Mira Loma or any particular site as a location for an inland port. The study indicates that scarcity of feasible, available sites and community concerns make Mira Loma an unlikely location for an inland port facility. Other areas such as those beyond the Inland Empire including Victorville and Barstow and North Los Angeles County may offer more realistic locations. We recognize that this is a sensitive matter and requires further analysis. With regard to Colton Crossing and other rail capacity projects, SCAG recognizes that the private industry (the railroads) accrue substantial benefits and should pay their share of the cost of these improvements. SCAG's proposed rail business case, listed as Appendix F in Transportation Finance Report, highlights the importance of proper cost allocation to develop a sound public private-partnership framework.
08-140	2/15/08	Whooley, James		Email	I am a bicycle commuter. While the draft plan makes positive statements about the need to accommodate bicyclists, it does not go far enough. There should be a firm commitment to provide safe, dedicated bike lanes on roads throughout southern California. Riding in car traffic is a risk some of us take, but many more people would use bikes instead of cars if there was sufficient physical separation of the bike lane from both the moving traffic and the parked cars. I would like to see streets built such that the bike lane was between the parked cars and the sidewalk, so there would be a buffer between the bicyclist and the moving traffic. Why not dedicate some funds to test this on one or two local roads and observe the results? This is truly a situation where "if you build it they will come." Please be visionary about what it will take to get people out of their cars and onto their bicycles.	Comment noted. The Safety Supplemental Report in the RTP recommends the addition of dedicated bicycle facilities, where appropriate. In Chapter 3 of the RTP and in the Non-Motorized Supplement Report, it is recommended to increase accommodations and planning for bicyclists and pedestrians. SCAG encourages land uses that enhance connectivity for pedestrians, bicyclist, and transit users through its advisory land use policies/strategies in Chapter 3 of the 2008 RTP.
08-141	2/17/08	Smith, Mark		Web form	Isn't it time we just dissolved SCAG? This isn't the Soviet Union, and we don't need some centralized bureaucratic functionaries telling us where to put buildings in our communities. Fold this mess up and leave people alone.	Comment noted.
08-142	2/19/08	Fung, Hank		Web form	<p>1 of 6 I am speaking in my role as a concerned citizen and not on behalf of any organization I may be employed or affiliated with. 1. How will the SCAG Regional Transportation Plan interact with the Metro Long Range Transportation Plan, given that the Metro LRTP has not even made it sway out to a draft stage yet for public comment?</p> <p>2 of 6 How much of the benefit alleged at the conclusion of the adoption of this RTP as a result of the "maglev" program? Describe how much of the congestion improvements (in percentages) are of as a result in highway expansion, transit expansion, maglev/high speed rail, and transportation systems management. Are there any of the improvements that are a "black box" (meaning that they</p>	<p>1 of 6 SCAG continues to work closely with Metro staff to ensure coordination between the Metro Long Range Plan and the 2008 RTP to the extent possible and practical. While Metro has yet to finalize their long range plan, they have provided input in developing the 2008 RTP. Furthermore, there is a mechanism in place that allows for amendment to the RTP should there be a need for one before the next full RTP update.</p> <p>2 of 6 Comment noted. SCAG's program is technology neutral, thus the program is called the High-Speed Regional Transport (HSRT) system.</p> <p>3 of 6</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>are improvements to be determined, similar to the definition in the SCAQMD Air Quality Management Plan) ? Maglev remains an area of controversy and no public outreach has ever been conducted to the citizens who would be directly impacted by Maglev, with the exception of the California-Nevada Maglev proposal whose last outreach was now three years ago. No Environmental Impact Report, or even a scoping study, has been given on the Maglev proposal (whereas scoping has been conducted for the Gold Line, I-710 project, Alameda Corridor East, and is being conducted for the Eastside Light Rail, Crenshaw Corridor, and subway projects). What will happen to the regional airport strategy should Maglev either be financially or politically infeasible? Can we really expect freight to coexist with passenger rail at high speeds (page 121, HSRT will also incorporate freight)?</p> <p>3 of 6</p> <p>How does the Regional Comprehensive Plan and the Regional Transportation Plan, as well as the Compass 2% strategy, interact? Will cities be forced to comply with the Compass 2% mandate? Compass describes "carrots", such as free guidance and software, to the cities who wish to participate. What "sticks" does SCAG have in order to implement the housing element, and for cities to build housing near transit and thus achieve the reduction in trips forecasted by the plan?</p> <p>4 of 6</p> <p>Why did SCAG not hold any public hearings to an evening or weekend audience, instead reserving its opportunities for public comment only to individuals who could take time off work out of the middle of the day to comment? I made my comment in this regard on December 19, at the start of the cycle, and it appears that nothing was done in this regard to expand public outreach. Why did SCAG send someone to make a presentation (to the Southern California Transit Advocates) who refused to take comments from the public, instead forcing them to enter them via this web site? One of the questioners at that outreach portion noted that SCAG did not make an attempt to "in-reach" to the public. Whether that being public service announcements on cable access television, press releases to community newspapers (not merely posting them on your web site), or contacting one of the reporters on the transportation or government affairs beats at the local newspapers serving the counties, SCAG has done an extremely poor job of letting the public be aware of what is going on. The Regional Transportation Plan has received no articles in the past month (January 19-February 19, 2008), according to Google News. SCAG's Public Participation Plan itself states http://www.scag.ca.gov/downloads/home/PPP_AdoptedAmend01_Oct07.pdf : "SCAG must, to the maximum extent practicable-- (i) hold any public meetings at convenient and accessible locations and times;(ii) employ visualization techniques to describe plans; and (iii) make public information available in electronically accessible format and means, such as the World Wide Web, as appropriate, to afford reasonable opportunity for consideration of public information under paragraph 1 above."</p> <p>I do commend SCAG for placing more information on the World Wide Web</p>	<p>The 2008 RTP contains the Regional Council adopted, advisory land use policies/strategies, which were founded upon the Compass Principles that had been included in the 2004 RTP. The Compass Principles were designed to provide planning policy guidance to SCAG member cities and counties. SCAG is responsible for the development and adoption of the RTP, and does not have the authority to undertake land use planning. The Regional Comprehensive Plan (RCP) is an advisory document that identifies potential policies for consideration by the public and private sectors. Cities will not be forced to comply with the advisory land use policies/strategies contained in the RTP or with the suggested policies in the Draft 2008 RCP. See also Master Response No. 1, Section 3, Final 2008 RTP PEIR Addendum.</p> <p>4 of 6</p> <p>The public hearings referenced by commenter were held during business hours largely because survey data collected by SCAG from interested parties indicated that such hours were most convenient for individuals to attend meetings. Further note that SCAG conducted several outreach presentations on Saturdays to help reach out to those who might not be able to attend weekday events. The public was also invited to provide comments directly to SCAG via our website to further enhance accessibility. We are pleased to hear that a presentation was made to the Southern California Transit Advocates. SCAG received 25-30 print and electronic media press including community newspapers, interviews on local radio talk shows, and evening broadcast local news at the time the draft plan was released. In an orchestrated and coordinated effort, SCAG held a joint press conference on December 6 to lay out the challenges of the region via the State of the Region Report, and then provide the solutions to those challenges by announcing the release of the Draft 2008 RTP. Following the initial coverage in the press, community papers have continued to print articles on the draft Plan. For example, local papers have continued to print articles; the most recent occurred in the Hi-Desert Star the first week in March. In implementing SCAG's Public Participation Plan, SCAG has worked to increase the RTP's visibility and provide greater public access to more information about the RTP than ever before on its website. A simplified, one-page RTP fact sheet has also been available on SCAG's website since October 2007. SCAG has proactively outreached to low income and minority households as well as Tribal Governments. Those organizations that expressed an interest in hearing about the 2008 RTP and subsequently received a presentation included: NAACP, Latino Urban Forum, Greater Riverside Hispanic Chamber of Commerce, City of Los Angeles Congress of Neighborhoods, Advisory Council to the Los Angeles Council on Aging, Tribal Alliance of Sovereign Nations (October 2007</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>than ever before. However, more of a fact sheet/executive summary format is also desired for those of us who are not professional engineers. Following on the participation plan, it notes: "(1) The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for: (vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low income and minority households, who may face challenges accessing employment and other services;" Describe how SCAG has outreached to low income and minority households. On the outreach calendar, the only outreach I see in the past few months to a minority organization is the NAACP Lake Elsinore Chapter, which is held AFTER the close of the comment period. (A presentation was made to native tribes in October 2007 but was conducted before the RTP was released for public comment by the Transportation and Communications Committee.) How has SCAG fulfilled its obligations under Title VI of the Civil Rights Act? Also in the Public Participation Plan, adopted by the Regional Council, SCAG notes: Goal 2.... "Translate the most significant web site information and printed materials into other languages when needed and contingent upon resource and budget availability. Include the ethnic press in media advisories, press releases, press conference notifications, calendar advisories and other media communications. Maintain and update ethnic press contacts in the media contact database." Public Participation and Consultation Report, p. 3: "Once the RTP draft is released, key RTP communications (i.e., RTP Fact Sheet, and Executive Summary) will be translated into in Spanish and posted online." This did not happen. As you know, there is a significant number of persons in the SCAG region that are limited-English-proficient, the majority of whom are proficient in Spanish. Imperial County may be majority LEP. The only items that were translated in Spanish and Chinese were the notice of public comment. No outreach presentation or fact sheet were in these two languages. Goal 5...."Goal 5: Enhance the participation process including seeking out and considering the needs of traditionally underrepresented and/or underserved persons. Ensure that minority and low-income persons have meaningful access to the public outreach and involvement activities. • Coordinate with individuals, institutions or organizations to reach out to members in the affected minority and/or low income communities. • Choose an event site and time convenient for participants. All events should be fully accessible to all citizens, including disabled, low-income and minority communities. Encourage the participation of elected officials at events and hearings. • Provide assistance, if requested 14 days prior to the event, to people with disabilities, including individuals who are blind, have low-vision or are hearing impaired. • Provide language assistance, if requested 14 days prior to the event, to Limited English Proficient Persons. • Evaluate public participation efforts at the end of each phase of the planning process so that necessary modifications can be made for subsequent phases. Provide recommended strategies to enhance the outreach program and better serve the underrepresented segments of the region."It is clear to me that the attempt of public participation has fallen</p>	<p>and February 2008), Child Health and Safety Fair in Los Angeles, East Hollywood Neighborhood Council Resource Fair, San Bernardino Neighborhood President's Association, Disabled Resource Center Offices, San Geronio Neighborhood Association, and the North side Improvement Association. The timing of the presentations rests with the host organization. We have also conducted presentations in each of the 14 subregions within the SCAG region to bring the draft RTP to the community level. Notice of public availability of the Draft 2008 RTP and three public workshops was translated into Spanish and Mandarin, and posted on SCAG's website. In addition, our public survey seeking comments on transportation issues and priorities for the RTP was translated into Spanish and used at the various fairs and neighborhood events cited in the paragraph above. Draft RTP materials were provided to the ethnic press and several of them covered the draft RTP in their papers. In addition, notice of the public comment period was included in La Opinion and the Chinese Daily News. Further, SCAG conducted RTP presentations which were translated into Mandarin via an interpreter at the request of the host organizations. Note that SCAG operates with limited resources in translating materials. For the Final 2008 RTP, SCAG will be posting the Executive Summary along with the revised RTP brochure that was designed to simplify the RTP in Spanish, along with multiple language translations of the RTP fact sheet to better inform a greater number of residents.</p> <p>5 of 6 While congestion pricing represents a promising funding source for transportation, additional analyses is needed to assess revenue potential and applicability. To this end, SCAG will be initiating a Regional Congestion Pricing Study in the coming months.</p> <p>6 of 6 SCAG is currently re-organizing and expanding its aviation committees including the Aviation Technical Advisory Committee, and is evaluating how to have more effective relationships with other agencies including Los Angeles World Airports and the various county transportation commissions (to better coordinate on airport ground access issues) in order to help fill the void created by the pending dissolution of the Southern California Regional Airport Authority.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>woefully short of past cycles. A model public outreach cycle would have been the 1998 RTP cycle, where there were almost a dozen meetings held at different times and locations throughout the SCAG area. If SCAG does not follow its Public Participation Plan, how can the public expect that SCAG will follow through on any of its other public commitments?</p> <p>5 of 6</p> <p>In section IV of the RTP, funding was discussed. Why is congestion pricing not included as one of the funding strategies? It is clear based on the action on the Metro Board that Los Angeles County, at the very minimum, will move forward on congestion pricing as a funding source. New highway facilities should be congestion tolled as much as feasible. This includes the I-710, High Desert Corridor, and Palmdale-La Crescenta Tunnel.</p> <p>6 of 6 Page 109, RTP... the Southern California Regional Airport Authority has been disbanded (yet again). Will SCAG try to use its leadership role to revive the authority? How can SCAG convince members of Orange and Riverside Counties to come to the table and discuss a sound airport strategy?</p>	
08-143	2/19/08	Griffin, Charles		Web form	<p>Why would SCAG not correspond with the CEO for input to the SCAG 2008 RTP? jmorris@american-maglev.com. I am personally promoting (as I as I responded below to the PEIR) that the FAA take charge of replacing short flights (less than 600 miles) with high-speed (300+mph) Mag-Lev, express (non-stop) service from dense urban centers to remotely-located airports (e.g. Palmdale & Victorville) for international non-stop flights that serve trans-continental and inter-continental (over water) routes.</p>	Comment noted.
08-144	2/19/08	Jusay, Tony		Email	<p>Below I included a few word in red to consider. •Page 1, paragraph 2: "...non-motorized devices such as scooters, skateboards, rollerblades..." I think its a great idea to include "wheeling" devices e.g. scooters, rollerblades, and skateboards. Check out ICLEI example: http://tinyurl.com/2ym8rv •Page 14, paragraph "SOCIAL/GROUPS"- "...and supportive bicycle culture, activity and advocacy efforts include informally and formally organized rides of..."</p> <p>Although you do note that SCAG does not endorse a particular ride or group you may want to state that social rides are "activities" as well as rides that "advocate", and that they are organized informally and formally. Informally referring to a ride that anyone can participate in with few or no requirements and formally where some organizations require signing a liability waiver, for example.</p> <p>My last comment is a general comment for the policy recommendation section under "Policies and Outcomes". Can you address encouraging land use that makes non-motorized more achievable and attractive. For example, large-scaled planned communities such as in San Bernardino and Riverside counties (even here in LA county) could have people's needs (grocery, cleaners, etc.) that are situated within a mile or less for shopping.</p>	<p>Comment noted. SCAG will reference new technologies and innovations in personal transportation in the Non-motorized Supplemental Report. SCAG will note that social groups can have social rides as well as advocacy rides, both formal and informal. SCAG's Compass Blueprint Program supports and encourages creative, forward-thinking and sustainable development solutions and land use that fit local needs and support shared regional values. The Safety Supplemental Report in the 2008 RTP notes that the State, as part of the Strategic Highway Safety Plan, intends, as a strategy to "incorporate bicyclists into smart growth, land-use planning and other local plans."</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-145	2/19/08	Kvarekvaal, Rune		Email	<p>After attending numerous SCAG GM Meetings and studying numerous Documents on Transportation Issues, I feel somewhat obliged to make some comments and alternative proposals to the 2008 RTP. GM in the SCAG Region is at a critical juncture. Both Capacity-wise and Emission-wise. Public Funding, clean Energy and 'fresh' Land are also hard to come by. Projects proposed in the RTP to mitigate Congestion and Emission, are in the opinion of many not nearly sufficient enough to e.g. meet international, federal, state and local authorities' air quality requirements, within a reasonable time frame. Projects seem to me, to be too fragmented and complicated, and take too long to implement. Building Grade Separations, one (1) at the time, along non-aligned rail corridors Expanding Rail Track Capacity, along non-aligned rail corridors Upgrading obsolete, fully depreciated Diesel-Locomotives to Tier 3 and 4 Emission Standards Using good Land for two (2) Truck-Lanes in each direction along I-710, SR-60 and I-15, Constructing a 'local', elevated Alternative Technology Conveyance System, and Adding Inland Ports to existing Rail Corridors are in my opinion small scale improvement/modification projects, , almost 'spot' fixes, instead of what's needed, A LARGE SCALE / MEGA REGIONAL SYSTEM, that takes less than 10 years, preferably 5 – 7 years, to implement. My main alternative proposal focuses on and has Railroad at its core. A different kind of railroad, though, than the existing ones. The alternative starts with ship-arrivals in San Pedro Bay (SPB), via extensive on-dock rail, new lifting technology, transformed rail yards, zoned container distribution by rail to intermodal nodes/shuttle ports, electrified high-speed-conform, fully grade-separated rail corridors, that ultimately end up at Interstate Ports at the NV/UT Border, and in the Phoenix/Tucson Area (AZ). Class I RR's Diesel Locomotives would take over from these points on. Mixed traffic corridors, min.3 tracks. Full HSR passenger conformity; local, regional, interstate. All Grade Separations are included in the overall proposal. Expanded Rail Capacity, min 3 tracks, is part of the new re-aligned Corridor, The proposal includes an all Electric Railroad. All import, export and empty containers would be moved to and from Shuttle Ports (transformed Rail Yards), Interstate Ports (new) and Sea Ports by Rail. All containers lifted onboard trains bound for their final destinations. Trucks would distribute containers locally (around Shuttle Ports). A system based on Rail would eliminate the need for Truck-Lanes, 2 in each direction. A system based on Rail would eliminate the need for Alternative Technology Conveyance System, and it would also eliminate the need for traditional Inland Ports, incl. Warehousing and Transloading. Once the Goods Movement part of the equation is solved, every other transportation mode would fall into place. The plan addresses all (all) the traditional problems discussed; like land-use, congestions, pollution, safety, funding deficits, time-use, energy-use, etc. Effects: Only marginal additional Land is needed. No waiting ships in SPB. Truck-free Ports within the 5 – 7 years' time frame. Dramatic reduction of Goods Movement (containers, semi-trailers, etc.) along all SC highways. Dramatic reduction in Passenger Vehicles along SC highways, especially along I-10 east of SR-215, and I-15 north of SR-210. Implicit Pollution reduction.</p>	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>Fewer accidents, in which trains and trucks are involved. No need to expand the Region's airports (incl. a new 'McCarran' in Las Vegas) or add new highways. Funding would have to be 100% private. 30 years+ BOT similar concession / agreement. A cost of \$80B-100B may be expected. Entire Systems attract Funding more easily than 'spot' fixes. Entire alternative plan finalized within 2016. A practical example: Approx. 40,000 containers are imported and exported (incl. empties) every day. Approx 14.6 M annually. Existing routines: on a particular day Toyota were to receive one hundred (100) 40'-containers in POLA. Loaded with spare parts. Destination: Warehouse in Ontario (Milliken/Jurupa) Drayage VMT Import: 60 miles x 100 containers = 6,000 miles Drayage VMT Empties: 6,000 miles. A total of 12,000 miles, Probably 1,000 hrs of trucking time (shipping and handling). In my alternative plan: Imported containers loaded onboard a Shuttle Train, One-Lift's Lifting Technology. Destination: A transformed Rail Yard Shuttle Port, e.g. in Mira Loma (One-Lift's Technology) Drayage VMT Import to Toyota: 5 miles x 100 containers = 500 miles Drayage VMT Empties from Toyota: 500 miles A total of 1,000 miles (a difference of 11,000 miles, and only 200 containers involved) Trucking Time: probably 300 hours (a difference of 700 hours, equivalent to 90 working days, each 8 hrs, 1/3 of a full year) Differences are staggering. If similar proportional advantages could be achieved for all Shuttle Ports (10-12), Congestion and Emission problems would easily be solved, in the best interest of the Citizens of the SCAG region, and the competitiveness of California's industries.</p>	
08-146	2/19/08	Reifer, Jane		Email	<p>It is would be a strategic use of existing rail infrastructure and scarce transportation funds to close the gap between the Norwalk Metrorail Green Line Station and the Norwalk Metrolink Station. Filling this very small 2.5 mile gap would hugely enhance the usability of both the existing Metrorail Green Line and Metrolink systems, as well as potential Amtrak and High Speed Rail systems. It would: -Allow Metrolink passengers to easily access the LAX area. - Allow Riverside County commuters an alternative to the 91 Fwy. -Provide access between LA County South Bay cities and Orange County / Disneyland / San Diego. Please consider including this project in the current RTP.</p>	Comment noted. SCAG takes input from our stakeholder agencies and attempts to identify projects based upon performance, within required financial planning constraints. Los Angeles County projects included in the RTP reflects input from LA County METRO, which has the responsibility for providing countywide input to the RTP & RTIP.
08-147	2/19/08	Smith, Mike		Email	<p>In my opinion, it looks like some key points are related to JWA Airport and other Airports: - We need to alert the Citizens, of the more than \$500 Million Improvement Project going on at JWA. No one is going to spend that much money and not be adding more flights. We need to get the Citizens to attend the AWG (Airport Working Group) Annual Meeting set for February 26, 2008 at the Balboa Yacht Club at 6:00PM. The featured speaker will be John Moorlach, Chairman of the Orange County Board of Supervisors. We will be discussing the impacts of an ever growing airport on our community. We need to find another location for a NEW LARGE AIRPORT. We also need to get the other Corridor Cities (Orange, Santa Ana, Tustin, Anaheim) involved too. We need to get the OC Supervisors on board for this and the next point too. (I wish part of</p>	Comment noted.

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					the \$500 Million would have been used to find another location). - We need to find a way to transport the current passenger load at JWA to outer airports, possibly via High Speed Rail, etc.. (I wish part of the \$500 Million had gone to folks getting serious about a high speed rail system). This would be a huge benefit for Southern California and the entire State. We need to find a place for a NEW LARGE AIRPORT. By the way, El Toro Airport is still just sitting there. Of course they do have, "The Great Ballon Ride". As a community, we need to "Wake up" and see that JWA is setting up to add more flights, etc. in the future. We need to protect our residents from not only Airport Expansion, but also from more flights. We need to protect our Back Bay Natural Preserve and our Public Beaches from Jet Pollution and the Noise of Airplanes. I would like to see the "JWA Airport" on each agenda for both Newport Beach and Costa Mesa City Councils. I would like to see the Daily Pilot Newspaper, the OC Register and the LA Times, have a weekly update on the JWA Airport. One section of the paper devoted to just JWA and the other Southern California Airport issues. They could also announce up coming meetings that address JWA, other Airports, etc.. We, the Citizens and the environment of Newport Beach and Costa Mesa have taken our fair share of hardship, noise, pollution, etc. when it comes to the Airport. It's time to find another location for a LARGE COMMERCIAL AIRPORT, and get there by "speed train". I think that a High Speed Rail System would be a huge benefit for our State. We are wasting too much time in our cars as it is now, and the pollution is terrible.	
08-148	2/19/08	Yee, Jonathan		Letter	<p>1 of 9 General - Please increase the resolution of Legends for all figures. They are difficult to read p.18: Misspelling of Commission. Right column, "California-Nevada Super Speed Train Commission"</p> <p>2 of 9 Demand Management p. 92: A section for "hard" strategies such as congestion/parking/transit pricing should be included to existing sections-rideshare, work-at-home, and non-motorized transportation. The section may briefly describe success of SR-91 Express Lanes and I-15 HOT lanes. The section will the supplement pricing/toll section on p.102 and should list goals to study potential corridors Parking pricing strategies, employer parking cash out policies, employer transit subsidies, or car sharing are example of "hard" strategies that complement the SCAG Compass Blueprint and RTP Transit strategies. A section should be included to recommend action to price on-street parking, review parking policies, encourage employer parking cash out/transit strategies in transit oriented areas, and expand availability of car sharing adjacent to transit/mixed use areas</p> <p>3 of 9 Pricing/TollsP. 101: Toll and High Occupancy Toll (HOT) Lane Corridors and Facilities section should start on page 102 for greater clarity . P. 102 and p.103: LACMTA has recently approved studies to supplement federal funding efforts for HOT lanes along portions of I-110, I-10 and, I-210. These should be recommended by the plan as strategic projects to supplement LACMTA efforts. Opinion: The public in general hates tolls, charging for "freeways" is</p>	<p>1 of 9 Comment Noted. Changes will be made to correct spelling.</p> <p>2 of 9 Comment noted. Consideration of suggested pricing strategies will be studied in depth for future plan updates.</p> <p>3 of 9 Comment noted. Pricing strategies will be further explored in SCAG's Regional Congestion Pricing Study. Findings from this study will be incorporated into SCAG's next RTP update effort.</p> <p>4 of 9 Comment noted . A smart streets discussion will be included in Chapter 3 of the RTP.</p> <p>5, 6, 7 of 9 Comment noted.</p> <p>8 of 9 The Exhibit 5.2 on p. 164 of the Draft RTP shows Baseline in 2035, not 2003. Drops in speed are expected given over 32 years of growth in population and travel demand.</p> <p>9 of 9 While congestion pricing represents a promising funding source for transportation, additional analyses is needed to assess revenue potential and applicability. To this end, SCAG will be initiating a Regional Congestion Pricing Study in the coming months.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>typically political suicide, and the use of toll facilities as HOT lanes offers 1) Expansion of HOV facilities, 2) Expansion of express transit routes, 3) Opportunities for SOV to use such facilities. Finance. p. 149-151: Pricing policies for parking used to complement TDM policies may serve as an additional source of local funding for street/curb operations and maintenance</p> <p>4 of 9</p> <p>Arterial Improvements p. 104: The RTP should mention the implementation of "smart streets" within Los Angeles and Orange Counties which supplement descriptions in the existing section. This special roadway classification may assist federal funding efforts for arterial improvements</p> <p>5 of 9</p> <p>Transit Strategies p. 105: Transit projects should be itemized in a table with numbers. Exhibit 3.5 should contain numbers next to each project location for clarity and identification. p. 108: Misspelling of Century in Table 3.5 "Green Line Extension (Mariposa/Nash to Century/Sepulveda LAX" p. 108: Project "Great Park/Spectrum 5-Mile Transit System" is not located on Exhibit 3.5 or Exhibit 3.6</p> <p>6 of 9</p> <p>High Speed Rail p. 111: High-Speed Regional Transport Section should start on page 112 for greater clarity. p. 114: Ridership projections should be shown for each stage of the IOS. In addition, freight movement should be shown for each segment/extension.</p> <p>7 of 9 Alternative Technology-Based Goods Movement An equivalent should be presented in Layman's terms for greater clarity, i.e. "The Hobart Yard extension of the IOS is equivalent to removing 25,000 truck trips per day or reducing 125,000 truck-miles per day."</p> <p>8 of 9 Plan Performance p. 164: Check the speed data gathered for Baseline 2003 PM Peak speeds. Southbound towards the El Toro Y (I-405/I-5 junction), Northbound Interstate 15 north of I-10, and Eastbound SR-60 near I-215 all appear to contain average speeds below the 35-54mph range indicated in Exhibit 5.1</p> <p>9 of 9</p> <p>In section IV of the RTP, funding was discussed. Why is congestion pricing not included as one of the funding strategies? It is clear based on the action on the Metro Board that Los Angeles County, at the very minimum, will move forward on congestion pricing as a funding source. New highway facilities should be congestion tolled as much as feasible. This includes the I-710, High Desert Corridor, and Palmdale-La Crescenta Tunnel.</p>	
08-149	2/19/08	Zeigler, Chris		Email	<p>1) Connect source and destination locations with routes that are not hostile to bicycling (35 MPH on narrow traffic lanes) and include adequate end-of-trip facilities (showers or at least changing areas or Public/private partnerships with fitness facilities that can provide changing areas yet address the issues of undesirable elements. Work with the state to obtain authorization to use experimental design standards - example, on multi-lane arterials the outside lanes could have lower speed limits than the interior lanes. 2) Address the social issues with bicycle use: Debunk the theory(s) that "Bicyclists don't pay to</p>	<p>(1) Comment noted. (2) Comment noted, see Chapter 4 of the Draft 2008 RTP, and Figures 4.7 - 4.11 which discuss transportation financing and revenue. (3)-(4) Comment noted. The Safety Supplemental report in the RTP notes that the State, as part of the Strategic Highway Safety Plan, intends to "educate all roadway users regarding the rights and responsibilities of bicyclists" and to "improve bicycle safety expertise among transportation professionals."</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments												
					use the roadways" and the belief bicycling in a traffic lane is "stupid" as it is a fact that riding in a traffic lane is smart as it prevents the most common types of motor vehicle/bicycle collisions. 3) Protect the civil rights of bicyclists. Fund the creation of a training module for law enforcement officers and fund officer hours for task force operations - example, decoy police officer bicyclist (the value here is the resulting publicity). I'm willing to bet that in the entire Los Angeles metropolis there isn't one instance of a law enforcement officer writing a citation to a motorist that tailgated or overtook a bicyclist too closely or used their horn unlawfully. 4) Fund education programs for bicyclists.													
08-150	2/19/08	Keane, Leslie	Laguna Woods, City of	Letter	<p>The City of Laguna Woods (City) offers the following comments on the 2008 Regional Transportation Plan (RTP) and related Draft Program Environmental Impact Report (PEIR): 1. Land Use Impact 3.8-1 and Mitigation Measure (MM)-LU.3: Adopt the Baseline Growth Forecast rather than the Policy Growth Forecast to make the RTP more consistent with city general plans in Orange County and to reduce potential significance after mitigation. The City is very concerned over the distribution of growth in households and employment contained in the RTP's Policy Growth Forecast compared with the Baseline Growth Forecast using data from Orange County Projections (OCP) 2006. In the three U.S. Census tracts that comprise most of the city, households were reduced by 257 and employment by 1,082:2000 Policy Forecast Policy Forecast</p> <table><thead><tr><th>Census Tract</th><th>Households</th><th>Employment</th></tr></thead><tbody><tr><td>626.22</td><td>-132</td><td>-809</td></tr><tr><td>626.23</td><td>-88</td><td>-138</td></tr><tr><td>626.46</td><td>-37</td><td>-135</td></tr></tbody></table> <p>Other Census Tracts that the City shares with adjacent communities also show similar reductions from OCP 2006. These combined reductions are a significant change from the City's General Plan. Laguna Woods is unique among cities nationwide in having residents with an average age of 78. There is only a limited amount of developable land, with the rest built out as a residential retirement community or for commercial uses. Adoption of the Policy Growth Forecast and efforts to bring the City's General Plan into consistency with it could reduce City revenues which could undermine our ability to provide services to residents. 2. MM-AV.1 through MM-AV.10: Change the word "shall" to "should," or explain why such a change will not be made. 3. MM-BIO.1 through MM-BIO.45: Change the word "shall" to "should," or explain why such a change will not be made. 4. MM-CUL.1 through MM-CUL.17: Change the word "shall" to "should," or explain why such a change will not be made. 5. MM-EN.17: Change language to: "Local governments should consider jobs/housing balance and, to the extent practical and feasible, encourage the development of communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel." 6. MM-GEO.1 through MM-GEO.10: Change the word "shall" to "should," or explain why such a change will not be made. 7. MM-HM.1 through MM-HM.6: Change the word "shall" to "should," or explain why such a change will not be made. 8. MM-LU.1 through MM-LU.9 and MM-LU.16 through MM-LU.18: Change the word "shall" to "should," or explain why such a change will not be made. 9.</p>	Census Tract	Households	Employment	626.22	-132	-809	626.23	-88	-138	626.46	-37	-135	<p>The Baseline Growth Forecast has been approved as the forecast for the 2008 Regional Transportation Plan. The Baseline Growth Forecast is consistent with the OCP- 2006 (as documented in the 2008 RTP Growth Forecast Report). All analysis and text related to the policy growth forecast in the 2008 RTP has been removed from the document.</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 21.</p>
Census Tract	Households	Employment																
626.22	-132	-809																
626.23	-88	-138																
626.46	-37	-135																

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
					<p>MM-NO.1 through MM-NO.19: Change the word “shall” or “will” to “should,” or explain why such a change will not be made. 10. MM-OS.1 through MM-OS.10, MM-OS.12 through MM-OS.21, and MM-OS.26 through MM-OS.30: Change the word “shall,” “make,” or “will” to “should,” or explain why such a change will not be made.</p> <p>11. MM-OS 3.10-1 through MM-OS 3.10-3: Please change language to: “The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall would be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.” This is one of several recommended changes in mitigation measure wording from “shall” to “should” to make them more consistent and allow local governments greater flexibility in achieving the goals of the RTP. 12. MM-OS.23: This measure, “Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements,” should be eliminated as it duplicates mitigation stated in MM-O.15, implementing agency consideration of loss of open space before final project approval. 13. MM-POP.1 through MM-POP.4: Change the word “shall” or “will” to “should,” or explain why such a change will not be made. 14. MM-PS.1 through MM-PS.26: Change the word “shall” to “should,” or explain why such a change will not be made. 15. MM-SEP.1 through MM-SEP.22: Change the word “shall” to “should,” or explain why such a change will not be made. 16. MM-W.1 through MM-W.19: Change the word “shall” to “should,” or explain why such a change will not be made. 17. SR 241/Foothill Transportation Corridor South (FTC-S): Include the full SR 241/FTC-S alignment in South Orange County on all RTP base maps, including the Policy Forecast base maps, reflecting its status as a transportation control measure in the RTP and in the South Coast Air Quality Management Plan. Adopt the Baseline Growth Forecast rather than the Policy Growth Forecast to maintain the substantial revenue-producing residential and employment population on the corridor that has been projected since 1991. 18. Orange County Council of Governments (OCCOG) Comments on Mitigation Measure in PEIR: Adopt all OCCOG recommendations regarding PEIR Mitigation Measures. 19. Cal State Fullerton Center for Demographic Research (CDR): Adopt all CDR recommendations regarding PEIR Mitigation Measures.</p>	

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-151	2/15/08	Shen, Erie	Long Beach, Port of	Letter	<p>On behalf of the Port of Long Beach, I am pleased to submit the following comments on the draft Regional Transportation Plan (RTP). We have reviewed the Goods Movement Report (December 2007) contained within the RTP and the draft Program Environmental Impact Report. In general we find these reports are well written and accurate with respect to maritime activities. We would like to offer the following comments.</p> <p>Maritime Ports The last sentence of the Goods Movement Report on page 3.14-15 is outdated. The Port of Long Beach combined with the Port of Los Angeles is the world's fifth-busiest port complex in 2006 (15.8 million total TEU), after Singapore (24.8 million TEU), Hong Kong (23.2 million), Shanghai (21.7 million) and Shenzhen (18.5 million). The data source is enclosed for your reference. Clean Trucks Program</p> <p>The Goods Movement Report briefly mentions truck replacement and retrofit as a strategy for diesel emissions reduction. Please be aware that in December 2007, the Port of Long Beach and the Port of Los Angeles adopted a cargo fee of \$35 per loaded TEU to support funding of the truck replacement program. This will generate about \$1.6 billion for new trucks and retrofits. We anticipate beginning the fee collection on October 1, 2008. Infrastructure Cargo Fee In January 2008, the Port of Long Beach and the Port of Los Angeles adopted an Infrastructure Cargo Fee (ICF) to supplement the costs of highway and railroad projects within the harbor area. We anticipate beginning the fee collection on January 1, 2009, at an initial rate of \$15 per loaded TEU. The ports also remain committed to working with regional partners to find a funding solution for the Alameda Corridor East Trade Corridor projects and Colton Crossing. The proposed legislation (SB 974), which is supported by the Port of Long Beach, is one possible solution. Inland Ports In 2008 the Port of Long Beach and the Port of Los Angeles plan to jointly evaluate the feasibility of inland ports as a potential long-term strategy for managing growth of port cargo. International trade through the SCAG region creates decent jobs and drives the nation's economy. Our region with a combined population of 18 million residents, however, is bearing the brunt of traffic congestion, safety, and air quality impacts. The Port of Long Beach is committed to developing programs that will support the anticipated growth in trade activities with minimum impact on the region's environment. We cannot do it alone – we stand ready to work with you in implementing programs envisioned in the Regional Transportation Plan.</p>	<p>Comment noted.</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 39.</p>

2008 Regional Transportation Plan Comments

Ltr ID	Date	Name	Affiliation	Format	Comment	Response to Public Comments
08-152	2/19/08	Mortazavi, Kia	OCTA	Letter	<p>The Orange County Transportation Authority (OCTA) has reviewed the PEIR, and has the following comments:</p> <ul style="list-style-type: none"> • Page ES-7 and 1-3: The description of the No Project Alternative does not state which growth forecast is paired with the reasonably foreseeable transportation projects. • Page ES-46: The PEIR states that the potential for inconsistencies between the 2008 RTP and currently adopted local land-use plans and policies is deemed a significant impact. OCTA believes the 2008 RTP should be based on locally adopted land-use plans and policies, and that the 2008 RTP growth forecast should be consistent with locally approved demographic forecasts, namely Orange County Projections 2006. • Page 1-4: OCTA has requested that the Orangeline Magnetic Levitation project (Orangeline Maglev) be removed from the constrained plan of the 2008 RTP. While the PEIR states that the Orangeline Maglev “was not included in the detailed GIS mapping and quantitative modeling for the 2008 RTP,” the Orangeline Maglev is included in SCAG’s draft 2008 RTP list of modeled projects. Please ensure that all references to the Orangeline Maglev are removed from the final PEIR and list of modeled projects for the 2008 RTP. • Map 2.1-10 (2035 Grade Separation Projects in Orange County): The map is missing the Raymond Avenue grade separation project in the City of Fullerton, as well as all the grade separations planned on the Metrolink right-of-way between the cities of Anaheim and Irvine, including Ball Road, State College Boulevard, 17th Street, Santa Ana Boulevard, Grand Avenue, Redhill Avenue, Jeffrey Road, and Sand Canyon Avenue. • Section 3.2 (Air Quality): Since an Air Quality Technical Study was undertaken, consider including it in the reference section. • Page 3.2-31: OCTA recommends including a brief discussion of the screening assessment that led to the conclusion that the project-specific cancer risk would exceed the threshold of one in 1 million. • Page 3.2-32: OCTA recommends an expanded discussion that the overall cancer risk is expected to decrease dramatically (Table 3.2-9) as compared to the existing 2008 scenario. • Page 3.2-40: Would greenhouse gas (GHG) emissions still be expected to increase under the 2008 RTP due to increased vehicle miles traveled (VMT) in light of the expected improvements in Partial Zero Emission Vehicle and Zero Emission Vehicle technologies? • Page 3.2-41: Table 3.2-17 provides SCAG’s estimate of GHG emissions by county for 2008, 2020, and 2035. These estimates do not include all sources of GHG emissions. SCAG proposes that the PEIR be used for tiering purposes. An inadequate or misleading estimate of Orange County GHGs could be carried forward into future project-level environmental impact reports. • Page 3.5-17: OCTA recommends including a reference to the Pier Pass Program, which was designed to improve operations and air quality in and around the ports of Los Angeles and Long Beach. • Page 3.14-5: In Table 3.14-2, Riverside County’s percent of regional AM peak-period VMT should be 11 percent, rather than 1 percent. Also, 	<p>Comment noted.</p> <p>See Final PEIR Addendum Section 5 Responses to Comments on the Draft RTP PEIR, letter 11.</p>

2008 Regional Transportation Plan Comments

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					<p>Orange County's percent of daily regional vehicle hours of travel (VHT) should be more than 1 percent based on the data presented.</p> <p>- In Table 3.14-3, Orange County's existing daily vehicle hours of delay seem too high compared with OCTA's 2006 Long-Range Transportation Plan (LRTP). SCAG should reevaluate this data.</p> <ul style="list-style-type: none"> • Page 3.14-24: In Table 3.14-12, consider titling the table "Daily Vehicle Hours of Delay (VHD) in 2008 and 2035 (in millions)." Also consider changing the subtitles to VHD, rather than "vehicle hours of travel in delay." <p>- The top section of Table 3.14-12 refers to "person hours of delay," while the title refers to VHT in delay. These are not the same statistics and should not be mixed.</p> <p>- In Table 3.14-12, assuming the values in the table refer to daily VHD, Orange County's values show no improvement over the No Build alternative; whereas, OCTA's 2006 LRTP demonstrates a 37 percent reduction in delay over the No Build scenario.</p> <ul style="list-style-type: none"> • Page 3.14-26: In Table 3.14-13, Orange County's percentage of evening work trips completed within 45 minutes by auto seems incorrect when compared with Riverside County. 	

2008 Regional Transportation Plan Comments

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Letters Received Past Close of Public Comment Period (February 19, 2008)						
08-L-01	4/1/08	Johnson, Roger	Los Angeles World Airports (LAWA)	Letter	<p><i>Comments in this letter are identical to Letter 08-064 from LAWA, with the exception of Comment 4 of 6. The revised Comment 4 of 6 is as follows:</i></p> <p>As in previous plans, the 2008 RTP proposes a regional high speed rail system. In this RTP, the extended Initial Operating Segment (IOS) along with a cargo component from the Ports is included as part of the Financially Constrained RTP and the remainder of the system is in the Strategic Plan. The RTP states that surface connectivity between the airports in the region is necessarily to achieve the decentralization of airport activity. It envisions the airports functioning as a single airport system with multiple remote terminals. The HSRT in the plan is cited as the basis for a regional airport system and a substantial part of the justification for the HSRT is air passenger ridership. Please note the following comments regarding this element of the plan. LAWA fully supports high-speed rail as a means to increase the utilization of regional airports, such as LA/Ontario International Airport. This can be most effectively accomplished with a high-speed rail system that connects population centers, such as West LA and downtown/Union Station, to the regional airports. The primary benefit to the region of providing connecting service is to make a broader range of air service available to the region's origin/destination passengers. Access to outlying airports via easy, reasonably priced, safe and accessible rail transit from the central population core would make outlying airports more attractive to residents and visitors, the primary customers we are trying to serve at our airports. The Initial Operating Segment described in the recent High Speed Transit Joint Powers Agreement is an excellent example of such a system.</p> <p>In addition to the IOS, the plan this year includes a proposed Maglev connection between Anaheim and Ontario International Airport (ONT) as part of a larger system proposed to Ultimately serve Las Vegas. The modeling for the aviation forecasts were completed before the Anaheim to ONT Maglev project was included in the RTP financially constrained projects. This proposed line may have significant potential to provide Orange County air passengers access to ONT and should be included in the RADAM modeling in the future to determine its' utility for serving Orange County air passenger demand. The RADAM model results which include the IOS show that ONT gains only 2.8 MAP in 2035 with the completion of the HSRT IOS, increasing from 28.8 MAP without the rail system to 31.6 MAP with it. This gain actually increases passenger demand at ONT over LAWA's estimated capacity of 30 MAP. At the same time, the HSRT substantially increases passenger demand at San Bernardino International from 3.3 MAP without HSRT to 9.4 MAP with the train. The conclusion is therefore that 6 Million Annual Passengers will be driven by capacity limitations at ONT and LAX to bypass both airports along the same HSRT route to use San Bernardino International for air travel. While it is clear how the model would assign passengers in this manner, are the results truly indicative of how passengers will choose airports in the future?</p>	<p><i>Response to comments in this letter are identical to Letter 08-064 from LAWA, with the exception of the response for Comment 4 of 6. The revised Comment 4 of 6 is duly noted.</i></p>

2008 Regional Transportation Plan Comments

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Letters Received Past Close of Public Comment Period (February 19, 2008)						
08-L-02	4/3/08	Crain, Robert A.	City of Blythe	Letter	<p>1 of 3 Interstate 10 Eastbound Truck Bypass Lanes: On Interstate 10, east of the Coachella Valley, I-10 rises at an approximate 6% slope for 10 miles. In addition, there is a second 15-mile grade from Cactus City to Chirico Summit. Both inclines severely hamper progress of heavy trucks and consequently faster passenger car traffic, traveling eastbound. In the alst year there have been two traffic accidents that have resulted from slow trucks pulling into the path of passing, faster traffic. Those accidents have completely shut down traffic on I-10. It should also be noted that slower traffic on those long grades contribute significantly to the emissions attributed to the Coachella Valley and the SCAQMD.</p> <p>2 of 3 Arizona California Railroad Embargo: In December 2007, the Arizona California Railroad (ARZC) filed an action with the Surface Transportation Board to declare an Embargo on the Blythe Branch line, from Rice south 49 miles into the Palo Verde Valley. Their justification is a lack of users on the line. In part, that is true, with declining and inconsistent rail service for several years, shippers cannot depend on cars being available and cost effective when needed. The ARZC has stated thaere is a \$6M maintenance effort necessary for this section of track for it to be safe and cost effective to move rail cars into and out of the Palo Verde Valley. If one rail car is the rough equivalent of three semi-trucks, then a theoretical annual minimum of 3,200 rail cars from the Palo Verde Valley would remove just under 10,000 trucks form the interstate highway system. This line should be considered for Transportation Corridor Improvement Fund (TCIF) eligibility.</p> <p>3 of 3 Alternative Fueling Station: The Palo Verde Valley/City of Blythe has long been the "dry spot" when it comes to alternative fueling stations between Phoenix and the metropolitan areas of Southern California on Interstate 10. Site selection near the freeway continues, looking for the ideal expandable site starting with CNG, progressing to LNG, hydrogen and other emission reduction technologies in the future. The City has been working in partnership with Riverside County, Mohave Desert AQMD and the Palo Verde Valley Transit Agency to find funding for this important project. Ms. JoAnn Armenta, Clean Cities Coordinator for SCAG is very familiar with our needs and the project.</p>	<p>1 of 3 The RTP will include Truck Climbing Lanes on I-10 in the Coachella Valley in the Strategic Plan, subject to TCC and Regional Council approval on May 8, 2008.</p> <p>2 of 3 We appreciate your comment, but please be advised that the TCIF project nomination process is well underway. The Southern California working group for the TCIF has submitted a comprehensive package of eligible projects. Further, the California Transportation Commission (CTC) has already taken action on staff recommendations. An on-line posting of the recommendations can be found on the CTC's website.</p> <p>3 of 3 Comment noted. At the conclusion of the site selection process, and when funding becomes available, this project may be considered for inclusion in a future RTP update.</p>
Letters Received on the Re-circulated Transportation Conformity Report						
08-C-01	4/28/08	Adriano Martinez, Bob Yuhnke, Michael	Natural Resources Defense Council,	Letter	The State approved South Coast PM2.5 and ozone SIPs are deficient such that any emission budgets derived from them should not be deemed adequate by U.S. EPA.	The issue of budget adequacy is solely under the purview of U.S. EPA. SCAG must use whatever budgets are deemed adequate by U.S. EPA for the conformity finding.

2008 Regional Transportation Plan Comments

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		Replogle	Environmental Defense Fund, et al			
Letters Received on the Re-circulated Transportation Conformity Report						
08-C-02	4/28/08	Fitts, Michael	Endangered Habitats League, et al	Letter	<p>The State approved South Coast PM2.5 and ozone SIPs are deficient such that any emission budgets derived from them should not be deemed adequate by U.S. EPA.</p> <p>The RTP does not adequately address the planning objective of encouraging the minimization of fuel consumption and air pollutant emissions.</p> <p>The RTP does not adequately analyze alternatives that minimize fuel consumption and air pollution.</p> <p>SCAG has failed to perform MIS studies for new projects contained in the 2008 RTP, including High Desert Corridor, as a precondition to their inclusion in the fiscally constrained portion of the RTP.</p>	<p>The issue of budget adequacy is solely under the purview of U.S. EPA. SCAG must use whatever budgets are deemed adequate by U.S. EPA for the conformity finding.</p> <p>The 2008 RTP proposes significant investment in the expansion of the regional public transportation system that will minimize fuel consumption as well as air pollution. Based on the analysis presented through the documentation of the 2008 RTP, implementation of the 2008 RTP will result in consumption of less fossil fuel when compared to the baseline scenario.</p> <p>While conformity regulation does not require evaluating alternatives for minimizing fuel consumption, SCAG, nonetheless, did conduct an analysis of fuel consumption at the regional level and demonstrated that the implementation of the 2008 RTP would result in less consumption of fossil fuel when compared to the Baseline Scenario. Relative to emission reduction, the 2008 RTP demonstrates compliance with all the requirements outlined under the federal transportation conformity regulations.</p> <p>Under the fiscal constraint requirements and conformity rules of the federal planning regulations, funding for projects included in the constrained RTP must be committed, available or reasonably available. Major Investment Study (MIS) is not a required precondition for including a project in the fiscally constrained RTP. Nonetheless, the new projects included in the 2008 RTP, including the High Desert Corridor, are supported by adequate documentation that meets the fiscal constraint requirements.</p>